

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105-3901

APR 1 7 2006

CERTIFIED MAIL NO. 7005 2570 0001 6436 4705 RETURN RECEIPT REQUESTED

Re: Warning Letter and Certification of Violation Correction for National Steel and Shipbuilding Company

John Martin
Environmental Engineering Specialist
National Steel and Shipbuilding Company
P.O. Box 85278
San Diego, CA 92186-5278
EPA Identification Number: CAD009158932

Dear Mr. Martin:

On November 16, 2005, a hazardous waste compliance inspection was conducted by representatives of the United States Environmental Protection Agency ("EPA"), accompanied by a representative of San Diego County Department of Environmental Health, at National Steel and Shipbuilding Company (NASSCO), located in San Diego, CA, with EPA Identification Number CAD009158932. During the course of this investigation, information was gathered in accordance with Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), as amended {42 U.S.C. § 6927(a)}.

The November 16, 2005 compliance evaluation inspection found violations of RCRA at NASSCO that were corrected during the course of the inspection or immediately afterwards. A copy of the inspection report is enclosed for your information ("Enclosure"). This letter should not be construed as a determination by the EPA of your compliance with any other applicable regulation.

The EPA routinely provides copies of inspection reports to state or tribal agencies, and upon request, to the public. Such releases are handled according to the Freedom of Information Act regulations, 40 C.F.R. Part 2, Subpart B. For any portion of the information included in this inspection report which is entitled to confidential treatment, please assert a confidentiality claim in accordance with 40 C.F.R. § 2.203(b). If the EPA determines that the information so designated meets the criteria set forth in 40 C.F.R. § 2.208, the information will be disclosed only to the extent, and by means of the procedures specified in 40 C.F.R. Part 2, Subpart B. As described in 40 C.F.R § 2.203(a)(2), the EPA will construe the failure to furnish a confidentiality claim within fourteen (14) calendar days from the date of your receipt of this letter as a waiver of

that claim, and information may be made available to the public by the EPA without further notice.

If you have questions related to the inspection report or this letter, please contact Clint Seiter of my staff at (415) 972-3298.

Loren Henning, Manager

RCRA Enforcement Office

Enclosure

Charles McLaughlin, California Department of Toxic Substances Control cc (w/o enclosure):

John Kolb, San Diego County Department. of Environmental Health



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION IX

75 Hawthorne Street San Francisco, CA 94105

WASTE MANAGEMENT DIVISION

RCRA ENFORCEMENT OFFICE

Purpose:

RCRA Compliance Evaluation Inspection

Facility:

National Steel and Shipbuilding Company

2798 Harbor Drive San Diego, CA 92113

EPA ID Number:

CAD009158932

Date of Inspection:

November 16, 2005

EPA Representatives:

Clint Seiter

Environmental Protection Specialist

(415) 972-3298

Jim Polek

Environmental Protection Specialist

(415) 972-3185

San Diego County Dept. of

Environmental Health Inspector:

John Kolb

Supv. Environmental Health Specialist

(619) 338-2472

Facility Representative:

John Martin

Environmental Engineering Specialist

(619) 544-3553

Report Prepared By:

Clint Seiter

Report Date:

December 19, 2005

BACKGROUND

Facility Description

National Steel and Shipbuilding company ("NASSCO" or "the facility") designs and builds ships, specializing in auxiliary and support ships for the U.S. Navy and oil tankers and dry cargo carriers for commercial markets. Per the facility representative, approximately 80% of the facility's resources is devoted to the construction of new vessels and the additional 20% is devoted to repairing existing vessels. NASSCO is one of three shipyards in the Marine Systems group of General Dynamics Corporation, headquartered in Falls Church, VA. NASSCO is located at 2798 Harbor Drive, San Diego, CA and currently employs 4146 people (1142 in administrative capacities, 3004 in actual ship production). NASSCO has been in operation at this site under its current management since 1960.

NASSCO submitted a Notification of Regulated Waste Activity to EPA on August 11, 1980, identifying itself as a generator of D001 (ignitable), D002 (corrosive), F001, F003, and F005 RCRA hazardous wastes. NASSCO submitted a 2003 Biennial Report confirming that it is a large quantity generator of the following RCRA hazardous waste streams:

EPA ID# CAD009158932	
Waste code	Waste description
D001/D035	Ignitable paint solids from shipbuilding paint operations
D007/D008	Abrasive blasting material used to remove paint from metal surfaces and tank cleaning
D001	Rags containing oil and solvent from metal surface cleaning
D007	Paint solids from hydroblasting operation on ship hull surface containing chromium
D005/D007	Baghouse dust generated during metal cutting operations for shipbuilding
D001	Ignitable paint solvent used for metal surface cleaning and cleaning paint
D002/D007	Corrosive acid from various shipbuilding processes to clean metal
D011	Developer and fixer solutions from photographic development
D039	Spent solvents from degreasing and cleaning operations
D008	Lead metal debris from shipbuilding

A manifest review for the year 2005 indicates that NASSCO still qualified as a large quantity generator of RCRA hazardous waste at the time of the inspection.

Per the EPA enforcement database, the facility had not been inspected by EPA prior to this inspection. NASSCO was last inspected by the California Department of Toxic Substances Control (DTSC) on April 22, 2004. Generator related violations were noted during this inspection, and the facility was recorded as having returned to compliance effective July 6, 2004.

MANUFACTURING PROCESS

Steel plates, including shapes, angles and I-beams, are transported onto the NASSCO premises via railroad or truck. Dirt is blasted off the plates by means of steel shot, preparing the plate surface for the paint application. Spent shot is transported to the California Portland Cement Co. as an excluded recycable material used in the manufacture of cement.

The steel shapes and plates are cut to specified dimensions either by dry cutting methods (generating an excluded recyclable dust) or by wet cutting methods (generating waste water processed through the facility's waste water treatment center).

The cut steel plates (typically ranging in dimensions from 10' x 20' to 10' x 40') are welded together into larger panels. Stiffeners (steel beams) are welded onto the panels for reenforcement.

Panels are welded together into "blocks" that will ultimately make up the ship. Once a block is completed, the subsystems are added such as lights, ventilation systems, ladders, etc. The major hazardous waste streams generated at this stage of construction are industry wipes contaminated with solvents.

"Blocks" are next assembled into "grand blocks." This stage of construction includes painting operations, where solvent-based (and, in some instances, copper-based) paints are used. Hazardous wastes generated at this stage include paint-related wastes and solvent-contaminated rags and personal protective equipment (PPE).

The completed and outfitted ship is launched for a series of tests. Oil used to flush out ship systems is the predominate waste stream generated at this phase.

Spent solvents generated throughout the different phases of construction are processed through a solvent distillation still. The still is cleaned out weekly, with the generated sludge being disposed of as a RCRA hazardous waste.

Repair work (for which the majority consists of Navy vessels) is conducted either pier side or in dry docks. Painting can consist of several coats (including anti-corrosive paint as well as anti-foulants (used to prevent growth of marine life on the ship's under surface)). Blasting operations remove existing paint from the ship, and the spent grit is managed as an excluded recyclable material.

INVESTIGATION

The purpose of the investigation was to determine compliance of NASSCO with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act (RCRA), as amended, the regulations provided in the Code of Federal Regulations (CFR), Chapter 40, Parts 261-265, 268 and 279, and the California Code of Regulations (CCR), Title 22, Division 4.5 and the California Health and Safety Code, Division 20. On November 16, 2005, Clint Seiter and Jim Polek, representing the U.S. Environmental Protection Agency (EPA), and accompanied by John Kolb from the San Diego County Department of Environmental Health, conducted an unannounced site investigation at NASSCO, San Diego, CA (ID# CAD009158932). Upon providing introductions and credentials, the inspectors contacted Mr. John Martin, Environmental Engineering Specialist. The inspectors explained that this was a routine inspection to determine whether or not the facility was in compliance with federal and state regulations concerning the proper management of RCRA and non-RCRA hazardous wastes. The inspection would consist of a walkthrough of the facility, focusing on those areas where hazardous wastes were handled or stored, with photos taken, followed by a record review and a post-inspection outbriefing.

Walk-Through Inspection

Metal Photo Lab/Machine Shop

Photo Lab Satellite Accumulation Area

There were three 55-gallon drums of RCRA hazardous waste stored in this area ("fixer and stop bath", "waste developer" and "sealing additive"). The drums were closed, in good condition, and labeled properly. However, the drum containing "sealing additive" lacked adequate access as required under the California Code of Regulations (CCR), Title 22 §66265.35. This has been documented as corrected per NASSCO's Environmental Corrective Action Request dated 11/17/05 (Attachment 1).



Photo 2: Machine Shop SAA #1

Machine Shop Satellite Accumulation Area #1

There were three 55-gallon drums of hazardous waste stored in this area (waste coolant" and "waste oil" (both non-RCRA hazardous wastes)) and "waste solvent" (a D001 RCRA hazardous waste). The drums were closed and in good condition. Per CCR title 22 §66279/21(b), containers of used oil must be labeled with the words "USED OIL", not "waste oil" as was done at this satellite accumulation area. Other than that, the containers were labeled properly. The drum labeled "waste oil" also lacked access, as is required under CCR title 22 §66265.35. This has been documented as corrected per NASSCO's Environmental Corrective Action Request dated November 17, 2005 (Attachment 1).



Photo 2: Machine Shop SAA #1

Machine Shop Satellite Accumulation Area #2

There were four 55-gallon containers in this area, two containing non-RCRA hazardous waste and one containing "excluded recyclable materials." The fourth drum ("empty containers") did not contain hazardous waste. No violations were noted in this area.

Photo Lab #1

The inspectors noted an open, unlabeled cardboard box of discarded film (a D011 RCRA hazardous waste because of its silver content). The inspectors informed the facility that this hazardous waste needed to be stored in a closed container and labeled according to the regulatory requirements for satellite accumulation area containers as described in CCR Title 22 §66262.34(e)(1)(E). Per NASSCO's post-inspection Environmental

Corrective Action Request EC-2005-37 (Attachment 1): "Photographic spent film will be handled in a flop top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily."



Photo 3: Open, unlabeled box of discarded film in Photo Shop SAA

- Computer Room

As in the Photo Lab, spent film was again stored in an open, unlabeled box. This was corrected per NASSCO's post-inspection Environmental Corrective Action Request EC-2005-37 (Attachment 1).

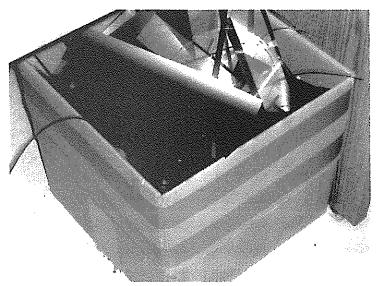


Photo 4: Open, unlabeled box of discarded film in Computer Room SAA

- Photo Lab #2

Inspectors noted a 5-gallon bucket with a hazardous waste label identifying its contents as "Spent photographic chemical containing silver" and with an accumulation start date of May 18, 2004. Per CCA Title 22 §66262.34(e)(1)(B), a generator cannot hold a satellite accumulation container on site for a period in excess of one year. This was addressed post-inspection in NASSCO's Corrective Action Request #EC-2005043.

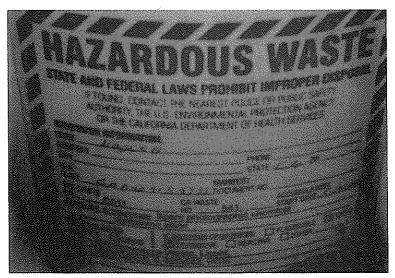


Photo 5: Photo lab #2 SAA waste in excess of one year

Machine Shop Satellite Accumulation Area #3

The inspectors noted five 55-gallon drums of hazardous waste stored in this area. All drums were closed, in good condition and labeled properly. No violations were noted.

Non-Detect Testing (NDT) Building

There were a one-gallon container identified as "spent fixer" and a one-gallon container identified as "spent developer." Neither container conformed to the regulatory requirements for hazardous waste labeling as described under CCR Title 22 §66262.34(e)(1)(E), specifically lacking:

- the words "Hazardous Waste";
- an accumulation start date;
- the composition and physical state of the waste;
- the hazardous properties of the waste;
- the name and address of the person producing the waste.

This has been addressed post-inspection in NASSCO's Environmental Corrective Action Request #EC-2005-038 (Attachment 1).



Photo 6: Inadequately labeled containers in NDT Building

Vehicular Maintenance Area

The inspectors noted the following:

One 250-gallon tank for used oil storage incorrectly identified as "hazardous oil" rather than "used oil", as is required under CCR Title 22 §66279.21(b). The tank was contained and had engineering certification. However, per the Vehicular Maintenance representative, daily tank inspections were not conducted, as is required under CCR Title 22 §66265.195(a) (corrected per Environmental Corrective Action Request # EC-2005-039 (Attachment 1));

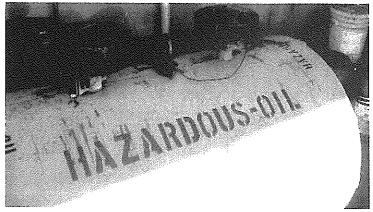


Photo 7: Mislabeled used oil tank in Vehicular Maintenance Building

One 55-gallon drum of used antifreeze, closed and labeled correctly;

- One 55-gallon drum of spent transformer oil, closed and labeled correctly;
- One pallet containing lead acid batteries and nine nickel-cadmium batteries. The
 nickel-cadmium batteries were not containerized and labeled per the provisions
 for Universal Wastes as described in CCR Title 22 §§ 66273.13 and 66273.14
 (corrected per Environmental Corrective Action Request # EC-2005-039
 (Attachment 1));

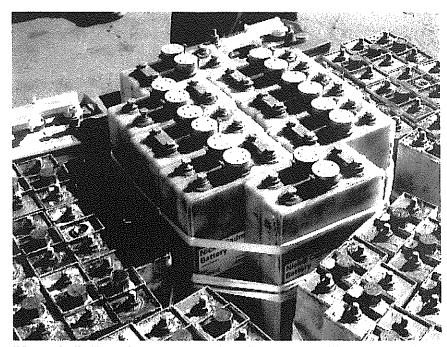


Photo 8: Pallet of uncontainerized/unlabeled NI-CA batteries

- Three 55-gallon drums of non-RCRA hazardous waste and one 55-gallon drum of excluded recyclable waste (oily rags). Drums were closed and labeled properly;
- One 55-gallon drum of cleaning pit sludge, closed and properly labeled.

Outside Tool Room

- There was one 55-gallon drum of spent alkaline batteries. The drum was labeled properly, but the locking ring was not secured, in violation of CCR Title 22 §66265.173(a) (open containers). This was corrected during the inspection.

Wastewater Treatment Area

Bilge and ballast water passes through an oil/water separator. The water is processed through the facility's wastewater treatment system, and the oil is pumped into a 6000-gallon storage tank, misidentified as "Waste Oil" instead of "Used Oil", as required under CCR Title 22 §66279.21(b) (this was corrected post inspection). No other potential violations were noted.

 There were also three 55-gallon drums of non-RCRA hazardous waste and one 55-gallon drum of excluded recyclables (solvent-contaminated rags) stored in the area. All drums were closed, in good condition and labeled properly. No violations noted.

Primer Line - Wheelabrator (Paint Stripper)

Surface blasting and primer painting operations take place in this building.

- Satellite Accumulation Area #1

 Two 55-gallon drums of non-RCRA hazardous waste and two 55-gallon drums of contaminated solvent awaiting processing through the facility's onsite solvent still, labeled "Excluded Recyclable Material." No violations noted

- Wheelabrator Satellite Accumulation Area

Water from the paint booth's water curtain is circulated through a centrifugal unit, generating zinc sludge, a non-RCRA hazardous waste. There were two 55-gallon drums of this zinc sludge at the Wheelabrator Satellite Accumulation Area, closed, in good condition and labeled properly. Per CCR Title 22 §6626.34(e)(1) a facility may not store more than 55 gallons of a particular wastestream at a satellite accumulation area. This has since been corrected.

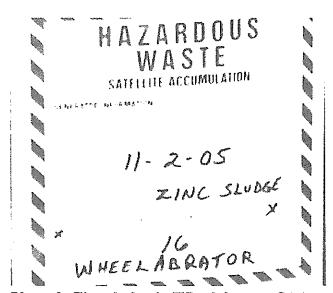


Photo 9: Zinc sludge in Wheelabrator, SAA

Waste Storage Area #1

There were approximately 160 55-gallon drums stored in the yard at the time of the inspection. Twenty three of these drums lacked access, as is required under CCR Title 22 §66265.35 (corrected per Environmental Corrective Action Request # EC-2005-041 (Attachment 1)). The

drums appeared to be in good condition, closed, and labeled properly, with accumulation start dates indicating storage within 90 days. In addition, there were nineteen drums of used oil, incorrectly identified as "waste oil," in violation of CCR Title 22 §66279.21(b), but otherwise labeled correctly, closed and in good condition (corrected per NASSCO's 1-12-2006 email to EPA (Attachment 1)). There were also sixteen pallets of paint-related waste (i.e., discarded paint cans) awaiting waste determinations and recontainerization.

There was a fire extinguisher mounted nearby as required under CCR Title 22 §66265.32(c). Per the facility representative, all personnel with access to the 90-day storage area are required to carry cell phones, which addresses the requirement covered under CCR Title 22 §66265.32(c).

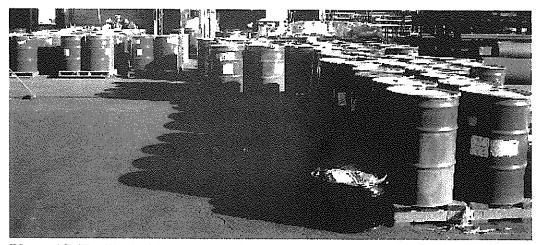


Photo 10: Facility's 90-day hazardous waste storage area

Waste Storage Area #2

This storage area is a short distance away from Waste Storage Area #1, and the facility's Universal Wastes (along with other types of waste) are stored here. At the time of the inspection, the inspectors noted the following:

- Two boxes of spent 8' fluorescent tubes, unlabeled and split at the seams;
- Three boxes of spent 4' fluorescent tubes, unlabeled and split at the seams;
- Four unboxed bundles of 8' fluorescent tubes and one unboxed bundle of 4' fluorescent tubes.

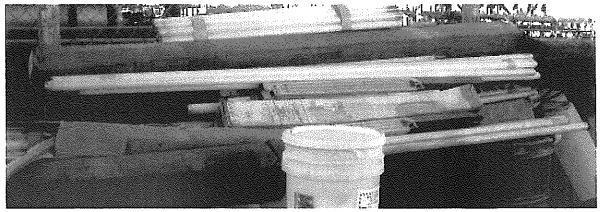


Photo 11: Unboxed or improperly boxed spent fluorescent tubes



Photo 12: Unboxed spent fluorescent tubes

Potential violations regarding spent fluorescent tubes were corrected per Environmental Corrective Action Request # EC-2005-041 (Attachment 1))

- One cart with open and unlabeled boxes of ballasts and batteries;
- Two 55-gallon drums of broken fluorescent tubes, closed and labeled properly;
- One pallet of uncontainerized discarded ballasts;

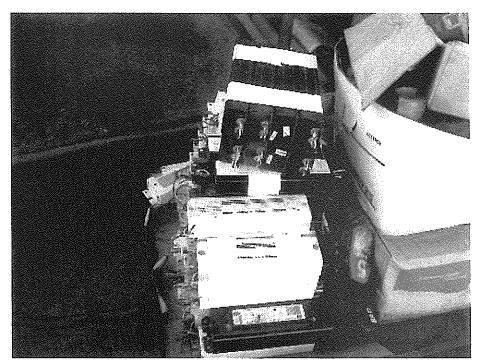


Photo 13: Uncontainerized discarded ballasts



Photo 14: Three open, unlabeled boxes of discarded NI-CA batteries

- Three 5-gallon containers with Hazardous Waste labels (with 6-3-05 accumulation start dates), labeled as follow:
 - "Dust Acid" (one container);
 - Trisodium Phosphate (two containers) (corrected per EC-2005-41 dated 11/17/05 (Attachment 1));

Per the accumulation start dates, these hazardous wastes had been stored in the waste storage area for a period in excess of 90 days.

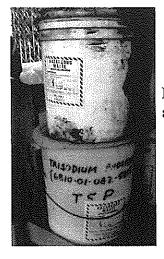


Photo 15: Three 5-gallon containers of hazardous waste with 6-3-05 accumulation start dates

- Ten 5-gallon containers of "used redlyme" from the Pipe Shop satellite accumulation area, requiring a waste determination;
- One unlabeled, open box of discarded x-ray film, identified as "scrapped lead (Pb)";



Photo 16: Unlabeled, open box of spent x-ray film

 One box of sodium nitrate with a 6/3/05 accumulation start date (more than 90 days from the date of the inspection); - One box of sodium vapor lamps without a Universal Waste label.

These potential violations have since been addressed with documentation per Environmental Corrective Action Request # EC-2005-041 and NASSCO's email to EPA dated 12-22-05 (Attachment 1).

Red Zone (outside Block Area)

Paint related waste, generated within the Block Area, is temporarily stored in the Red Zone before being relocated to the 90-day storage area. At the time of the inspection there were three pallets of mostly paint related wastes awaiting relocation. No violations noted.

On-Block Satellite Accumulation Area

There were seven 55-gallon drums stored in this area: three were paint-related RCRA hazardous wastes, and the other four were dirty rags slated to be laundered, and identified as "excluded recyclable material."

Area of concern: partially full cans of still usable paint were stored alongside the hazardous waste containers. The inspectors requested that the facility make a better effort to segregate product from waste in this area in order to avoid confusion.

Pipe Shop

Satellite Accumulation Area #1

There was one 55-gallon drum identified as "mud from tank bottom," a RCRA hazardous waste. The drum was labeled properly and in good condition, however, because it had an unsecured funnel in its bung hole, the drum was technically "an open container."



Photo 17: Pipe Shop SAA drum with unsecured funnel

This potential violation has since been addressed with documentation per NASSCO's email to EPA dated 12-22-05 (Attachment 1).

- Satellite Accumulation Area #2

There were five 55-gallon drums in this area, identified as follows:

- Three drums of non-RCRA hazardous waste (including one of discarded cotton gloves);
- Two drums of excluded recyclable material (i.e., oily rags to be laundered).

The inspectors noted contaminated cotton gloves in the oily rag bins, even though, per the facility representatives, contaminated cotton gloves are discarded, not laundered and recycled. The inspectors requested that concerned facility personnel be better trained in proper disposal of the contaminated cotton gloves, i.e., they are not to be considered "excluded recyclable material."



Photo 18: Pipe shop rag and glove 55-gallon drums

These potential violations have since been addressed with documentation per NASSCO's email to EPA dated 12-22-05 (Attachment 1)

- Solvent Still

Contaminated solvent is distilled and recycled here, with the generated sludge being disposed as a RCRA hazardous waste. At the time of the inspection there was one 55-gallon drum of dirty rags, closed, in good condition and labeled properly.

Adjacent to the still, in the same yard, were multiple pallets of partially full paint cans, some marked with paint expiration dates, others not. Per the facility representative, the cans stored here represent product available for further use. In one instance, one 1-gallon can of solvent based paint had an expiration date of August, 2005.



Photo 19: Pallets of paint awaiting further use near solvent still

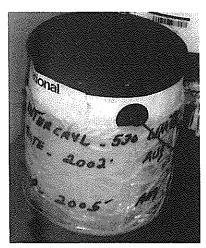


Photo 20: Paint can with old expiration date

The inspectors requested that an inventory be performed on the paint stored in this area, and if other containers of paint were found with expiration dates that have since passed, that these containers be properly disposed of. Per the facility's Work Instruction #103, dated November 29, 2005 (Attachment 1), this inventory was performed and paint-related hazardous wastes were manifested offsite for disposal on December 1, 2005.

Record Review

Manifests: No violations noted.

Contingency Plan: Plan lacked the location of all fire extinguishers on the facility premises as required under CCR Title 22 §66265.52(e). Other than that, the plan was satisfactory. This issue was addressed satisfactorily in NASSCO's email to EPA dated 1/12/2006 (Attachment 1).

Biennial Report: satisfactory

Training records: The facility representative was not able to provide the training records as described in CCR Title 22 §66265.16(d)(1)-(4), specifically:

- a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
- records that document that the training or job experience required have been completed.

A sample job-description and training record was provided to EPA post-inspection in EC-2005-

041, dated 11/17/2005.

Weekly inspection logs: satisfactory

POTENTIAL RCRA VIOLATIONS

Satellite accumulation area labeling requirements

Title 22 §66262.34(e)(1)(C); Title 22 §66262.34(e)(1)(E) (40 CFR §262.34(c)) A generator may accumulate as much as 55 gallons of hazardous waste at or near any point of generation if each container used for onsite accumulation is labeled with the words (Hazardous Waste" and with the following information:

- (A) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste:
- (B) composition and physical state of the waste;
- (C) the particular hazardous properties of the waste;
- (D) the name and address of the person producing the waste.

The following facility satellite accumulation areas had hazardous waste containers that did not comply with this requirement:

- Machine Shop
 - One unlabeled box of discarded film (D011) in Photo Lab #1;
 - One unlabeled box of discarded film (D011) in Computer Room;
- Non-Detect Testing Building
 - One unlabeled 1-gallon container of spent fixer;
 - One unlabeled 1-gallon container of spent developer;

These potential violations have since been documented as corrected.

90-day hazardous waste storage area labeling requirements

Title 22 §66262.34(a)(3) and (f) (40 CFR §262.34(a)(3))

Storage over 90 days

Title 22 §66262.34(a) (40 CFR §262.34(a))

Each container used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words "Hazardous Waste". Additionally, all containers shall be labeled with the following information:

- the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;
- composition and physical state of the waste;
- the name and address of the person producing the waste.

The following hazardous waste containers in the facility's 90-day storage yards did not comply with these labeling regulations:

- one box of discarded X-ray film was unlabeled;
- ten 5-gallon containers of "used rydlyme" were unlabeled.

These potential violations have since been documented as corrected.

A (large quantity) generator may accumulation hazardous waste on-site for 90 days or less without a permit.

The following hazardous waste containers had been stored in the hazardous waste storage area for periods exceeding 90 days:

- Two 5-gallon containers of trisodium phosphate (ASD: 6-3-05);
- One 5-gallon container of "dust acid" (ASD: 6-3-05);

 One box sodium nitrate (ASD 6-3-05).

These potential violations have since been documented as corrected.

Satellite accumulation area storage time

Title 22 §66262.34(e)(1)(B)

A generator may accumulate as much as 55 gallons of hazardous waste in a satellite accumulation area if the generator does not hold the waste onsite for more than one year from the initial date of accumulation.

One 5-gallon bucket of spent photographic chemical (D011) in the Machine Shop Photo Lab satellite accumulation area had an accumulation start date of 5-18-04.

This potential violation has since been documented as corrected.

Open containers

Title 22 §66265.173(a) (Article 9) (40 CFR §265.173(a))

Title 22 §66262.34(a)(1)(A) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with the applicable requirements of articles 9 of chapter 15. Title 22 §66265.173(a) (article 9) states that a container holding hazardous waste must always be closed during storage, except when it is necessary to add or remove waste.

The following hazardous waste containers were open at the time of the inspection:

- Machine Shop
 - One unlabeled box of discarded film (D011) in Photo Lab #1
 - One unlabeled box of discarded film (D011) in Computer Room;
- Outside Tool Room

 One 55-gallon drum of spent alkaline batteries did not have a secured locking ring:

- 90-Day Storage Area
 - One box of discarded X-ray film was open;
- Pipe Shop
 - One 55-gallon drum of "mud from tank bottom" had an unsecured funnel;

These potential violations have since been documented as corrected.

Per Title 22 §66262.34(a)(4), a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the generator complies with the requirements in articles 3 and 4 of chapter 15 and section 66265.16.

Title 22 §66265.35 (article 3) states that the owner must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

The following hazardous waste containers lacked access:

- Machine Shop: one 55-gallon drum of "sealing additive" lacked access;
- 90-day hazardous waste storage yard: 23 55-gallon drums of hazardous waste lacked access.

These potential violations have since been documented as corrected.

Title 22 §66265.52(e) (article 3) states that

Lack of aisle space

CCR Title 22 §66265.35 (40 CFR §265.35)

Incomplete contingency plan

Title 22 §66265.52(e)

(40 CFR §265.52(e))

the contingency plan shall include a list of all emergency equipment, including each device's location.

The facility's contingency plan lacked this information.

This potential violation has since been corrected.

Training Records

Title 22 §66265.16(c) (40 CFR §265.16(c))

Title 22 §66265.16(d)(1)-(4) requires that a generator maintain the following training records:

- (1) the job title for each position at the facility related to hazardous waste management, and the name of the employee filling each job;
- (2) a written job description for each position listed;
- (3) a written description of the type and amount of both introductory and continuing training that will be given to each person listed above;
- (4) records that document that the training or job experience required have been completed.

The facility did not have these records.

This potential violation has since been corrected.

POTENTIAL NON-RCRA VIOLATIONS

"Used Oil" label

CCR Title 22 §66279.21(b)

Containers and aboveground tanks used to store used oil shall be marked or clearly labeled with the words "USED OIL".

The following used oil containers were not

marked with the words "USED OIL":

- Machine Shop: one 55-gallon drum;
- Vehicular Maintenance Area: one 250-gallon tank;
- Wastewater Treatment Area: one 6000-gallon tank;
- Wastewater Storage Area: nineteen 55-gallon drums.

These potential violations have since been documented as corrected.

Per Title 22 §66262.34(a)(4), a generator may accumulate hazardous waste on-site for 90 days without a permit provided that the generator complies with the requirements in articles 3 and 4 of chapter 15 and section 66265.16.

Title 22 §66265.35 (article 3) states that the owner must maintain aisle space to allow unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment.

The following hazardous waste containers lacked access:

- Machine Shop: one 55-gallon drum of used oil lacked access.

This potential violation has since been documented as corrected.

Title 22 §66262.34(a) states that a generator may accumulate hazardous waste on-site without a permit provided that the generator complies with applicable requirements of article 10 of chapter 15.

Lack of aisle space

CCR Title 22 §66265.35

Tank inspections

CCR Title 22 §66265.195

Title 22 §66265.195 (article 10) states that the facility owner must inspect hazardous waste tanks daily.

Daily inspections were not performed for the used oil tank in the Vehicular Maintenance Area.

This potential violation has since been documented as corrected.

Universal Wastes

- Universal Waste lamps in closed containers

Title 22 §66273.13(c)(1)

A small quantity handler of universal waste shall contain any lamp in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Such containers shall remain closed.

- In the 90-day storage area the following was noted:
 - Two boxes of spent 8' fluorescent tubes, split open;
 - Three boxes of spent 4' fluorescent tubes, split open;
 - Four unboxed bundles of 8' fluorescent tubes.

These potential violations have since been

documented as corrected.

- Labeling Universal Waste lamps

Title 22 §66273.14(c)

A small quantity handler of universal waste shall label or mark the universal waste to identify the type of universal waste. Each container in which lamps are contained shall be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamp(s)", or "Waste

Lamp(s)", or "Used Lamp(s)."

- In the 90-day storage area the following Universal Waste lamps were unlabeled:
 - Two boxes of spent 8' fluorescent tubes;
 - Three boxes of spent 4' fluorescent tubes:
 - Four unboxed bundles of 8' fluorescent tubes;
 - One box of sodium vapor lamps.

These potential violations have since been documented as corrected.

- Labeling Universal Waste batteries

Title 22 §66273.14(a)

Universal waste batteries, or a container in which the batteries are contained, shall be labeled or marked clearly with any one of the following phrases: "Universal Waste - Battery(ies)" or "Waste Battery(ies)" or "Used Battery(ies)".

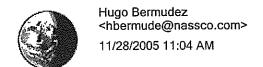
- Vehicular maintenance area: nine nickelcadmium batteries were not labeled as required;
- Waste storage area: three boxes of nickel cadmium batteries and one cart of batteries were not labeled as required.

These potential violations have since been documented as corrected.

cadmium batteries were not labeled as required;

- Waste storage area: three boxes of nickel cadmium batteries and one cart of batteries were not labeled as required.

These potential violations have since been documented as corrected.



To Clint Seiter/R9/USEPA/US@EPA

CC

bcc

Subject RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

----Original Message-----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:04 AM

To: 'seiter.clint@epa.gov'

Subject: NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

EC ECAR 041.pdf



Environmental Corrective Action Request (ECAR)

EC-2005-041 ISSUED DATE: 11/17/2005

Issued To: Warehouse (55) Reported By: John Martin

Robert Trick

Manager, Steel Production Control

Phone: (619) 544-7588

Mailstop: 37

Environmental Engineering

Phone: (619) 544-3553 Fax: (619) 744-1088

Email: imartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-041, to ensure that you meet the required deadline. Please reference EC-2005-041 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Haz-Mat Department. The following items were identified as non-compliance that need corrective action:

- 1. Waste Ni Cad batteries were not in proper storage container and had no Universal Waste labels on containers
- 2. Waste fluorescent tubes were not in proper storage containers and had no Universal Waste labels
- 3. Tri-Sodium Phosphate waste containers had HW label with end accumulation date over 90 day storage period.
- 4. Dave Power's employee job description does not provide haz-mat responsibilities
- 5. Drum storage area does not have the proper aisle space

Regulatory and/or EMS Reference:

Corrective Action Response:

Items 1-3

Universal wste containers for the batteries and tubes were delivered. Ashland to complete disposal by 12/08/05.

Ashland provided a profile for the TSP. Waste was disposed of on 11/28/05.

Min-Max for universal waste containers and labels to be established . ECD 11/30/05.

Dave Power was instructed to report hazmat exceptions to management and be reviewed weekly at the steel yard white board. Completed 11/28/05.

Item 4

see attached Warehouseman job description and training log.

Item 5

Drums congesting the area were dumped per procedure as of 11/28/05 allowing complete access to all drums. Drum processing recommended to occur weekly instead of every three weeks. ECD 12/01/05.



Environmental Corrective Action Request (ECAR)

/s/ Robert Trick on 11/29/2005

4

Before pictures



PICT0066JPG 2048x1536x24bjpeg



PICT0067.JPG 2048x1536x24bjæg



PICT0068JPG 2048x1536x24bjpeg



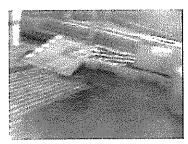
PICT0069.JPG 2048x1536;24bjpsg



PICT0070.JPG 2048x1536x24bjpeg



PICT0072.IPG 2048x1536;24bjæg



PICT0073.JPG 2048x1536x24bjpeg



PICT0074JPG 2048x1536x24bjpeg



PICT0075JPG 2048x1536x24bjpeg



PICT0076.JPG 2048x1536x24bjpeg



PIC10077.JPG 2048x1536x24bjæg

After Pictures: The following items have been addressed: Hazwaste drums have been moved and now have proper aisle spacing, NiCad batteries and fluorescent tubes have been placed in proper containers and labeled as universal waste, Tri-Sodium waste have been properly labeled and scheduled for pick up on November 30, 2005, Dave Power job description and training has been provide below.





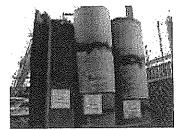


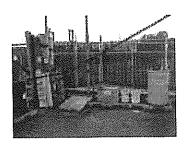






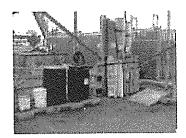


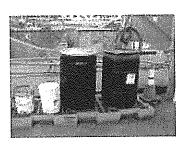


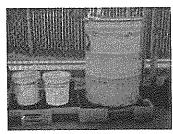


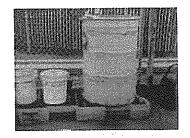












To: Mike Chee Fax 1088

From: Bol Trick x-7588

2 pages

THE COURTOLS FOR

Movember 24, 199%

WAREHOUSEMAN

Job descriptions for Dave Power of the Hazmat Department including ongoing training classes.

In order for a Journeyman Warehouseman to obtain a rating of "2" for ability, he/she must posses the following basic abilities: Anything less will be classified as a "1".

BASIC ABILITIES

- 1. Successfully pass the NASSCO Journeyman Forklift Operators examination. Be able to operate three of the following industrial fork truck types:
 - Gasoline/diesel powered yard truck.
 - Propane/Electric powered Receiving dock truck.
 - Electric Warehouse Stacker/Reach truck.
 - Electric OrderPicker or Narrow Aisle (Man-up) trucks.
- Read, write and understand English. Must have legible hand writing.
- 3. General math skills (addition, subtraction, multiplication and division).
- 4. Basic understanding of NASSCO's computerized Materials and Inventory Systems.
- 5. Unpack and inventory inbound material, match to packing slips, freight bills and other documentation.
- 6. Determine proper storage locations, store material and update the computer system.
- 7. Maintain quantity and location accuracy of NASSCO owned and Contract owned inventory.
- 8. Pick and process material issues using manually written and computer generated documents.
- 9. Able to repetitively lift 50 pounds.

ADDITIONAL ABILITIES

In order for a Warehouseman to obtain a rating of "3" for ability, he/she must have all of the basic abilities, plus ALL of the additional abilities listed below.

1. Prepare appropriate documents (i.e. Transportation/Damage Report (TDR), Over/Short & Damaged reports (OS&D), Material Return Adjustment (MRA), etc.)

- 2. Interaction with vendors, purchasing, material control, and production customers; both written and verbal.
- 3. Recommend adjustments to stock levels, reorder points, and order quantities.
- 4. Solve difficulties such as issue quantity discrepancies marking/tagging errors, transportation/delivery errors, location/quantity discrepancies.
- 5. Understand and effectively use advanced Materials/Inventory and Planning/Production computer systems to organize work and research material demands
- 6. Expertise in unique processes and procedures for at least 8 of the following material types:
 - N/C Schedule A GFM or owner furnished.
 - N/C Material Order Schedule (MOS)
 - N/C Fabrication Order Schedule (FOS)
 - N/C Steel and Pipe

i muni

- N/C Spares/Fitting out materials
- N/C Electrical Cable
- N/C Non-spec material
- NASSCO owned Min-Max and Surplus Inventories
- Ship Repair GFM
- Ship Repair, CF material
- Maintenance, Repair and Operating Materials
 - NASSCO Archives
 - Hazardous Materials (HAZMAT)
- 7. Must have significant cross-trade abilities as a Tool Room Attendant, Material Chaser, or pass the journeyman's test to operate an overhead, tower, or portal crane.
- 8. Understands common material identification codes, symbols, grades, and sizes. Able to employ basis material inspection techniques with this knowledge.
- 9. Able to operate all warehousing forklift trucks listed in the basic requirements.

A Warehouseman may be classified a "3" by also knowing <u>ALL</u> of the basic requirements, plus have passed the basic journeyman assessment test of another major trade, listed below:

- Inside Machinist
- Electrician
- Outside Machinist
- Sheet Metal

- Welder

Shipfitter

- Pipefitter

A Warehouseman may be classified a "4" by obtaining required abilities to qualify him/her as a "5" plus pass a basic journeyman assessment test of another major trade as listed above.

Hugo Bermudez

From: Chad Haza [chaza@nassco.com]

Sent: Tuesday, November 22, 2005 9:10 AM

To: 'Hugo Bermudez'

Subject: D. Powers | NASSCO Training

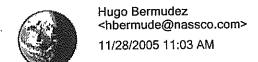
Dave Power 50698

Course	Completion	Session
ENV-10: HazMat Coordinator Training Refresher 2005	06/22/2005	С
RCRA/DOT Training, 40 CFR 262.34 & 49 CFR 172.700: 2005	06/23/2005	Α
ENV-10: HazMat Coordinator Training Refresher 2004	04/21/2004	С
ENV-10: HazMat Coordinator Training Refresher 2003	05/13/2003	С
ENV-01: HazMat Coordinator Training 2002	07/31/2002	E
2005 SPCC Briefing 40 CFR Part 112	09/29/2005	A

Chad Haza

Environmental Administrator
National Steel and Shipbuilding Company
T 619.544.8826
F 619.744.1088

mailto:chaza@nassco.com



To Clint Seiter/R9/USEPA/US@EPA

CC

bcc

Subject NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

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There are additional emails following this as I could not get all in one email due to size.

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company

2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

EC ECAR 037.pdf EC ECAR 038.pdf EC ECAR 043.pdf EC ECAR 044.pdf EC ECAR 045.pdf



EC-2005-037 ISSUED DATE: 11/17/2005

Issued To: Machining Division (3) Reported By: John Martin

Randy Hurless Environmental Engineering

Phone: (619) 544-3553 Fax: (619) 744-1088

Phone: (619) 544-8434

Mailstop: 15

Fax: (619) 744-1006

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-037, to ensure that you meet the required deadline. Please reference EC-2005-037 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Machine Shop. The following items were noted that need corrective action:

- 1. Proper aisle space between HW drums to allow for proper drum inspection to check for any leaks, proper labeling or damage to the drums.
- 2.Photographic negatives need hazardous a waste container with a lid. The container needs a hazardous waste label or label with the words hazardous waste and empty daily.

Regulatory and/or EMS Reference:

Corrective Action Response:

- 1b) Secondary containment (drums) will be moved to allow proper spacing and access to drums for inspections COMPLETE
- 1b) Drums containing new and waste materials will be separated from each other COMPLETE
- 2) Photographic spent film will be handled in a flip top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily - ECD 11/29/05

/s/ John Walden 11/22/2005

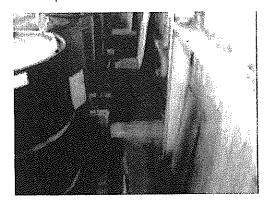
Before pictures: New containers for spent film have been ordered with lid and will be utilized.

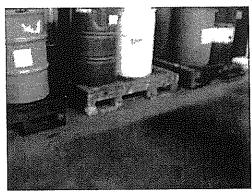






After pictures: The hazardous waste drums have been move to provide proper aisle spacing for drums inspections. New and waste material has been separated.











D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave a San Diego, CA 92110 Phone 619-276-9100 a Fax 619-276-9108 www.ddteol.com

After: Purchase requisition for spent film containers.

CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

Purchasing Fax: (619)398-8355

purchasing@ddtool.com

A/R Fax:

(619)398-1910

A/R E-mail

ar@ddtool.com

Sales Fax: (619)276-9199

Sales E-mail: expert@ddtool.com

Suppliers Please Ship To:

D&D TOOL & SUPPLY - Br# 01

1028 Buenos Ave

San Diego, CA 92110

Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ***

To

: JOHN WALDEN

Fax#

: 1-619-544-7901

: STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

** Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ****

** ACKNOWLEDGEMENT **

Order #: S1453839 D & D TOOL & SUPPLY

1028 BUENOS AVENUE

SAN DIEGO CA 92110

619-276-9100 Fax 619-276-9199

www.ddtool.com

Rel# :

Printed: 09:45:59 23 NOV 2005

Page # : 1 of 1

Sold To:

NASSCO/P CARD HARBOR DR & 28TH

SAN DIEGO, CA 92113

Ship To:

NASSCO/P CARD HARBOR DR & 28TH SAN DIEGO, CA 92113

619-544-8529

Ordere JOHN W		Order Date Ship Date 11/23/05 11/25/05	Ship Via VANCE O. BR01	Warehous Shp 1	se Prc 1
Writer STEVE		Salesperson Vance Oesterling	Customer PO# CC/ JOHN WALDER	· ·	Allowed
Ln†	Ordered 4ea	Product Description WAS 955056 6 GALLON POLY OILY W	ASTE CAN W/FT L	Unit Price 50.500 VR	Net 202.00
2	lea	WAS 955196 10X9 FUNNEL W/6 FLAM ******	E ARRESTR JUSTR	180.000 ITE	180.00
			SUBTOTAL		382.00
			Total Amount		382.00

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EC-2005-038 ISSUED DATE: 11/17/2005

Issued To: Quality Assurance (80) Reported By: John Martin

Keith Londot Manager, Quality Assurance

Phone: (619) 544-8802

Mailstop: 10

Environmental Engineering Phone: (619) 544-3553

Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-038, to ensure that you meet the required deadline. Please reference EC-2005-038 on any attachments that are submitted.

<u>Summary</u>

On November 16, 2005, US EPA personnel performed a RCRA inspection of NDT. The following items of non-compliance were noted that need corrective action:

- 1. Waste photographic chemicals need hazardous waste accumulation labels affixed to all storage containers.
- 2. Any waste photographic negatives will be placed in a container with a lid and have a hazardous waste label or a label with hazardous waste statement and empty daily wording will be attached to the container.

Regulatory and/or EMS Reference:

Corrective Action Response:

NDT Inspection Lab was generally unaware of the labeling requirements for spent film and developing chemicals.

Corrective actions have been accomplished on items 1 and 2:

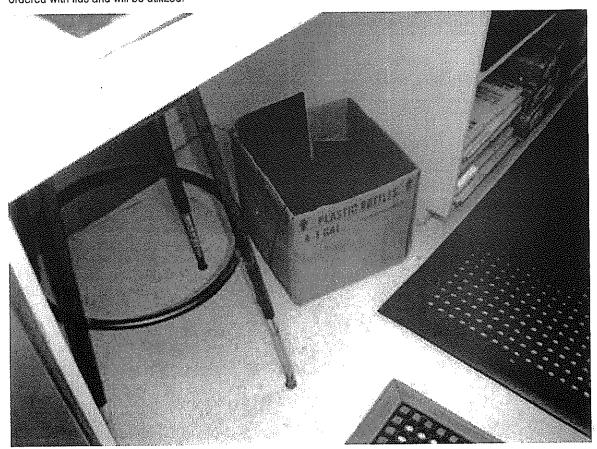
- 1) A container will be purchased and marked "Waste Radiographic Film" and "Empty Daily.
- 2) Containers for waste photographic fixer and waste photographic developer have been properly labeled with an approved hazmat label and marked "Empty Daily". Containers were also placed in secondary containment.

/s/ Bill Huston on 11/23/2005





After pictures: New containers for spent film have been ordered with lids and will be utilized.



After pictures: The spent fixer and developer chemicals have been properly labeled and secondary containment

applied to prevent accidental spillage.





D&D TOOL & SUPPLY

Corporate Office: 1028 Buenns Ave a San Diego, CA 92110 Phone 619-276-9100 m Fax 619-276-9108 www.ddtool.com

After: Purchase requisition for spent film containers.

CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

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purchasing@ddtool.com

A/R Fax:

(619)398-1910

A/R E-mail:

ar@ddtool.com

Sales Fax: (619)276-9199

Sales E-mail: expert@ddtool.com

Suppliers Please Ship To:

D&D TOOL & SUPPLY - Br# 01

1028 Buenos Ave

San Diego, CA 92110

** Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ***

To

: JOHN WALDEN

Fax#

: 1-619-544-7901

From

: STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

** Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ****

** ACKNOWLEDGEMENT **

D & D TOOL & SUPPLY Order #: \$1453839

1028 BUENOS AVENUE Rel# :

SAN DIEGO CA 92110 Printed: 09:45:59 23 NOV 2005

619-276-9100 Fax 619-276-9199 Page # : 1 of 1

www.ddtool.com

Sold To:

NASSCO/P CARD HARBOR DR & 28TH SAN DIEGO, CA 92113 Ship To:

NASSCO/P CARD HARBOR DR & 28TH SAN DIEGO, CA 92113

619-544-8529

Ordere	d by	Order Date Ship Date	Ship Via	Warehous	3e
JOHN W	_	11/23/05 11/25/05	VANCE O. BR01	Shp 1	Prc 1
Writer		Salesperson	Customer PO#	Freight	Allowed
STEVE		Vance Oesterling	CC/ JOHN WALDEN	Мо	
Ln#	Ordered	Product Description		Unit Price	Net
1	4ea	WAS 955056 6 GALLON POLY OILY WAS ASSESSED.	WASTE CAN W/FT LV.	50.500 R	202.00
2	lea	WAS 955196 10X9 FUNNEL W/6 FLAM ******	ME ARRESTR JUSTRI	180.000 TE	180.00
			SUBTOTAL	~ ~ ~	382.00
			Total Amount		382.00

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EC-2005-043 ISSUED DATE: 11/17/2005

Issued To: Corporate Relations (94) Rep

Jan Camahan

Marketing and Graphics Assistant

Phone: (619) 544-8825

Mailstop: 211

Reported By: John Martin

Environmental Engineering

Phone: (619) 544-3553 Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-043, to ensure that you meet the required deadline. Please reference EC-2005-043 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Photographic Department lab in Building 8. The following non-compliance item was noted that need corrective action:

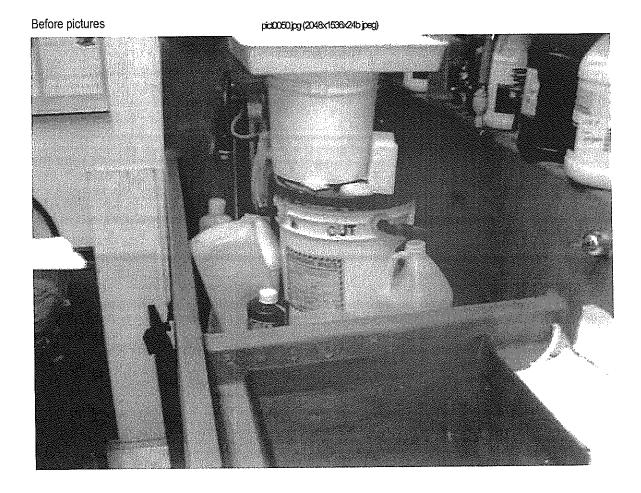
1. The HW label on the Silver recovery waste container was over the one year storage period for replacement.

Regulatory and/or EMS Reference:

Corrective Action Response:

Open requisition for service of three 5-gallon conisters for silver recovery systems. May X-Ray will be subcontracted for this service.

/s/ John Walden on 11/22/05.



NATIONAL STEEL AND SHIPBUILIDING COMPANY

MACHINE SHOP PURCHASE REQUISITION
RECOMMENDED VENDOR: MERRY X-RAY CHIEM ICAL CORP.
858-565-9923 PHONE 858-565-2409FAX

LINE ITEM	QUANTITY	UNIT	DESCRIPTION	UNIT PRICE	THUOMA
			PROVIDE SERVICE FOR		
			SILVER RECOVERY SYST	2119	
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	`		5GAL. CANISTER SYS:	1/2/1/ /2	9130,00
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	AUTHORIZED BY
	WORK ORDER / %
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	/

CALL JUE #8433



EC-2005-044

ISSUED DATE:

11/17/2005

Issued To: Blast & Paint (16)

Reported By: John Martin

Judie Blakey

Environmental Engineering Phone: (619) 544-3553

Superintendent, Production Phone: (619) 544-8443

Phone: (619) 544-3553 Fax: (619) 744-1088

Mailstop: 02

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Paining area - Paint Storage. The following item of non-compliance were noted that need corrective action:

- 1. A number of one gallon paint containers has no expiration dates on the paint containers.
- 2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

Regulatory and/or EMS Reference:

Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

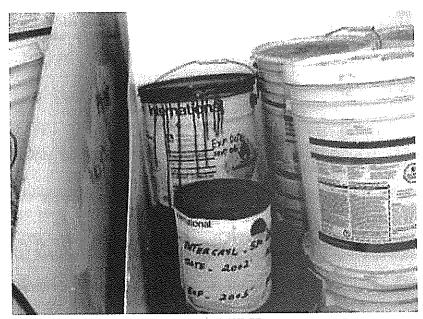
Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

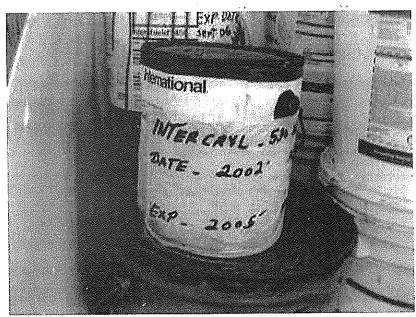
All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint will be provided as soon as it becomes available.



PICT0086.JPG 2048x1536x24bjpeg



P/CT0087JPG 2048x1536x24bjpeg



EC-2005-045 ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16)

Judie Blakey

Superintendent, Production Phone: (619) 544-8443

Mailstop: 02

Reported By: John Martin

Environmental Engineering

Phone: (619) 544-3553 Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

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Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Wheelabrator area. The following item of non-compliance were noted that need corrective action:

- 1. The paint water curtain sludge collection tank need a cover to prevent spillage.
- 2. Two HW paint sludge drums were identified in the same satellite accumulation area.

Regulatory and/or EMS Reference:

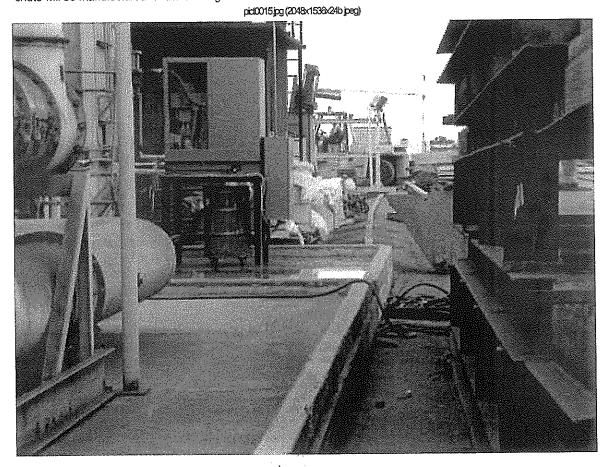
Corrective Action Response:

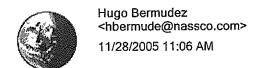
Before pictures: Drop chute for drum will be manufactured to prevent spillage.

pici0063.jpg (2048x1536x24b.jpeg)



After pictures: Hazardous waste paint sludge has been removed from the same satellite accumulation area and a drop chute will be manufactured for the existing drum.





To "'Hugo Bermudez'" <hbermude@nassco.com>, Clint Seiter/R9/USEPA/US@EPA

cc bcc

Subject RE: NASSCO Inspection November 16, 2005

One more email.

Hugo

----Original Message----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:05 AM

To: 'seiter.clint@epa.gov'

Subject: RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

----Original Message-----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:04 AM

To: 'seiter.clint@epa.gov'

Subject: NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com





Sshannond @aol.com 12/02/2005 07:53 PM

To Shannon Davis/R9/USEPA/US@EPA

CC

bcc

Subject Fwd: Monday December 5 - Sustainability Task Force Call - Call-in Information

Subj RE: Monday December 5 - Sustainability Task Force Call - Call-in Information ect:

We have arranged a call-in number for your use in participating in this December 5, 2005 ASTSWMO conference call. Please note this is a little different in that it's an "unattended" call. At 3:00 pm Eastern Standard Time (2:00 pm, Central, 1:00 pm Mountain; 12:00 noon Pacific) please dial into the following NEW number, 1-800-423-1988 and follow the prompts. When asked for your participant pass code number, enter 818174. I believe the prompt may ask that you add a # symbol too, but in any case follow the prompt. If you should get caught in a loop, and go to the operator assistance option instead, the call's moderator is Jay Shepard, and the conference ID number is 818174. Tkx, Tom

----Original Message---From: Shepard, Jay [mailto:jshe461@ecy.wa.gov]
Sent: Monday, November 28, 2005 6:18 PM
To: Stan Phillippe; Davis.Shannon@azdeq.gov;
Jennifer_Kaduck@dnr.state.ga.us; paleonar@gw.dec.state.ny.us;
sxhammon@gw.dec.state.ny.us; swmkerry@sso.org
Cc: Sharon Qualley; swmbarb@sso.org; swmtjk@sso.org; sshannond@aol.com
Subject: Monday December 5 - Sustainability Task Force Call

Hello Sustainability Task Force Members

Let's plan on meeting via conference call on December 5, from 3 to 4 EST, 12 to 1 PST. Call in information will be sent under a separate e-mail from ASTSWMO.

Agenda items:

Next steps - board direction and detailed work plan (see e-mail excerpt from Terry Gray, below).

Roll out and use of our products - the two pager and the examples paper.

Development of a PowerPoint presentation on sustainability that can be

used by ASTSWMO members.

Establishing a "networking backbone" using information technology. Product Stewardship Proposal - Collaborating with ISRI on automobiles.

Task Force membership.

Set meeting dates through mid-January if possible.

FYI - I receive the following in an e-mail from ASTSWMO President Terry Gray. We've got some work to do to prepare for the upcoming board meeting in January.

"...this group is at a critical point in its' development within ASTSWMO. The Board adopted the policy paper that the group developed at our last meeting. I think there is a general feeling of anxiousness now to move beyond the concept and develop and implement an action plan to show our members what great work is ongoing and show them how they can take the lessons learned back home to their own programs. To me, facilitating transferability of these experiences is a critical function for our organization.

"The bulk of the January Board meeting will be to put some action items and plans behind all the concepts adopted in the ASTSWMO strategic plan, including sustainability as a huge priority area. It would be very, very beneficial to have an informed discussion with the Board if you could get the sustainability group together and develop some preliminary short-term and longer term action plans. It's not critical to get it exactly perfect, but I think it is critical to keep the momentum going and start working on some clearly defined tasks."



EC-2005-039

ISSUED DATE:

11/17/2005

Issued To: Maintenance (62)

Reported By: John Martin

Mark Kukuchek

Environmental Engineering

Director T&T, Maint., Facilities Phone: (619) 544-8799

Phone: (619) 544-3553 Fax: (619) 744-1088

Mailstop: 38-A

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

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Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Maintenance area. The following items of non compliance were noted that need corrective action:

- 1. Large yellow used oil tank needs a daily inspection log to identify any leaks or waste in secondary containment area.
- 2. NiCad batteries were identified with lead acid batteries in the Maintenance battery storage area. NiCad batteries are required to be managed as Universal Waste. Batteries require a covered container for storage and a Universal Waste label.

Regulatory and/or EMS Reference:

Corrective Action Response:

BMP 111 "Universal Waste" does not cover proper separation of batteries, Ni Cads and Lead Acid.

Item 1) Set up daily log thru 12/31/06, also added tank check to maintenance daily housekeeping walkthroughs.

Item 2) Correctly sorted batteries, disposed of Ni Cads batteries as universal waste, also set up covered plastic waste drum as "Universal-Waste" for future NiCad battery disposal.

Set up training for supervision to better identify hazmat and handling.

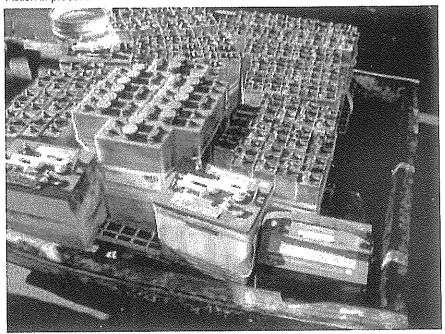
/s/ Carl Whitaker on 11/22/2005

Before Pictures: A new tank inspection checklist has been generated and implemented for the oil tank.



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Action in process:



PiCT0054JPG 2048x1536x24bjpeg

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			- Granding water to removed from the work area	and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	Mayoringan commission of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the st
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			- Fire lanes are clear and unobstructed Move Fire	<u> </u>	Jane!
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			Material Storage		
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	-		- Obsolete fixtures, tools & materials are sent to reclamation - B Zto F 4 : - Other Properly stored and organized issues	I- File (instead)	Con right
			- Other Properly stored and organized issues 34acd a	mide - Punase /	
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ا سر			- All skip tubs are emptied as required		
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	14.5	1	- Machinery is clean, leak free, and in safe working condition_ 552- 沙。	DN Samiberndir and	Jan 1 hours
N	2.	<u> </u>	- Machinery is clean, leak free, and in safe working condition. 352- 84 - Areas around machinery is free of debris and clear access 1944005	(10001.17.9	
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,	Not	Ī	Housekeeping	Corrective	Assigned Date
ОК	ΟK	NA	Item Description	Measure	To Completed
			Area Hazards - Crane rails are free of grease	,	
			- Lines, leads, and hoses are properly routed and organized Standing water is removed from the work area		
		İ	Area Access		
	•		- Designated walkways are clear and unobstructed		
			- Fire lanes are clear and unobstructed		
			- Access ladders are cleared at both top & bottom	.,.,	
سميي			- Storm drains are clear and unobstructed	THE PROPERTY WHEN THE WORLD BY MANUAL PROPERTY SERVICES WITHOUT THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY O	
٠			Material Storage	to the state of the state of the state of	10 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1
			- Material and equipment are stored and organized	The state of the same	
سسر			- Bins, shelves & cabinets are not overloaded		AND THE PROPERTY OF THE PARTY O
	اسميا	,		MWW- B12-14	
			- Other: Properly stored and organized issues - (ایری این این این این این این این این این ای	11 - 7 MINGS 19	//~Y/>
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			General Clean Up		
ا سب			- Work areas, roadways & walkways, are swept up and clean	Ben to describe programme and an analysis and programme as the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second se	
			- All debris, trash, paper, cans, wood, & dirt arè cleaned up - All trash collection containers are less than 3/4 full.	THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT OF THE CONTRACT O	
			- All tash collection containers are less than 3/4 toll.	AND THE RESIDENCE AND A STREET OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY	
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المستسم السيادة			Areas around machinery is free of debris and clear access Market	Listay	The same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the same of the sa
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To Clint Seiter/R9/USEPA/US@EPA

. cc

bcc

Subject RE: NASSCO Inspection November 16, 2005

Mr. Seiter:

Just following up, did you get my previous emails?

Hugo

----Original Message----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:07 AM **To:** 'Hugo Bermudez'; 'seiter.clint@epa.gov'

Subject: RE: NASSCO Inspection November 16, 2005

One more email.

Hugo

----Original Message----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:05 AM

To: 'seiter.clint@epa.gov'

Subject: RE: NASSCO Inspection November 16, 2005

Here is additional email.

Hugo

----Original Message----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Monday, November 28, 2005 11:04 AM

To: 'seiter.clint@epa.gov'

Subject: NASSCO Inspection November 16, 2005

Mr. Clinton Seiter:

The Environmental Engineering Department documented the items or compliance concerns during the inspection of November 16, 2005 and issued ECAR's (Environmental Corrective Action Requests) to the responsible departments.

The items are handled through NASSCO's Environmental Management System (EMS) Corrective Action Request (ECAR) program which initiates an investigation, corrective action and review of the compliance by NASSCO's Compliance Assurance Committee (CAC). The CAC is composed of 6 top management officials from different departments to review and recommend additional corrective and preventative actions.

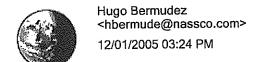
I have attached the ECAR's (PDF's) which include a summary, corrective or planned action(s), before and after pictures to demonstrate actions taken for each item. Please note the ECAR's may or may not currently have a response or

cause entered as they have 10 days to response and investigate. The completed ECAR's will be provided to you as soon as they become available.

There are additional emails following this as I could not get all in one email due to size.

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



To Clint Seiter/R9/USEPA/US@EPA cc: John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Corrective Actions Update 1 of 5

Clint:

Attached please find the updated corrective action forms indicated by a date. All items have now been completed except for the following:

ECAR 041: Some materials in the HazMat area have not been picked up by the disposal facility transporter as profile are currently being developed for the waste. This action is scheduled to be completed early next week.

ECAR 043: Currently scheduled to have Mary X-Ray (contractor) pick up and dispose of the silver recovery material in the photo lab and scheduled for 12/02/05.

As per our telecom, the paint was still within the 90 days after the expiration date. In addition, I have provided (attached to ECAR) Work Instruction 103 from the Paint Department which describes the management of expired paints and the paint inventory log. Please note that the Work Instruction was first issued December 1998 with a revision in December 2001 to include the handling of expired paints. All the paints have an expiration date either hand written on the container or printed bar code from the manufacture as described in the work instruction. I will provide you with a copy of the last paint inventory tomorrow as paint department personnel are gone for the day.

There are additional emails following this as I could not get all in one email due to size (5 total).

I forgot to ask in my last note if you wanted me to copy James Polek?

Please, if you have any questions or need clarification don't hesitate to contact me direct at 619 544 7780, cell at 619 997 2690 or via email.

Have a great weekend,

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company

2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

EC ECAR 045 113005.pdf EC ECAR 043 112905.pdf EC ECAR 037 112905.pdf



EC-2005-045

ISSUED DATE:

11/17/2005

Issued To: Blast & Paint (16)

Judie Blakey

Superintendent, Production Phone: (619) 544-8443

Mailstop: 02

Reported By: John Martin

Environmental Engineering Phone: (619) 544-3553 Fax: (619) 744-1088

Email: imartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-045, to ensure that you meet the required deadline. Please reference EC-2005-045 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Wheelabrator area. The following item of non-compliance were noted that need corrective action:

- 1. The paint water curtain sludge collection tank need a cover to prevent spillage.
- 2. Two HW paint sludge drums were identified in the same satellite accumulation area.

Regulatory and/or EMS Reference

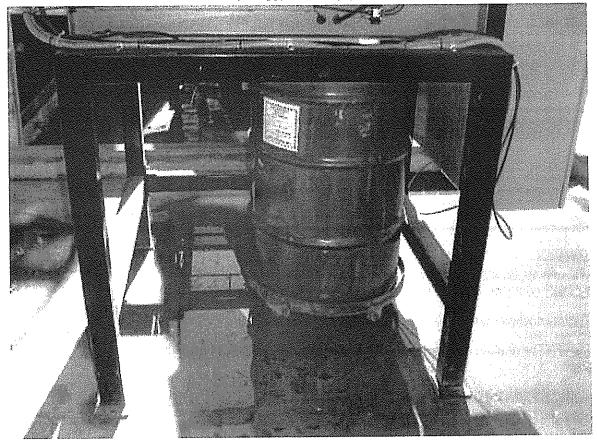
Corrective Action Response:

- a) A cover was fabricated and installed on the drum on 11/29/05.
- b) Reviewed environmental requirements with the hazmat coordinator and insured the drums were moved to hazmat on 11/18/05.

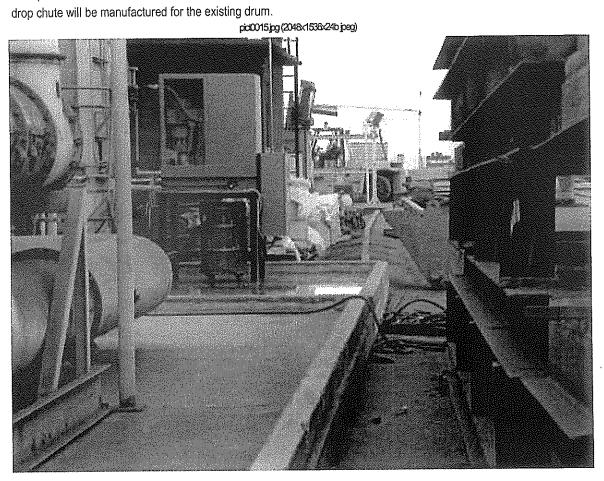
/s/ Fred Winston on 11/30/2005

Before pictures: Drop chute for drum will be manufactured to prevent spillage.

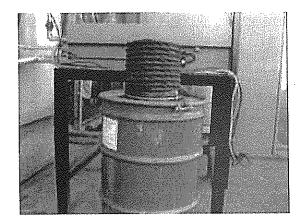
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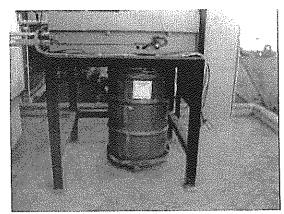


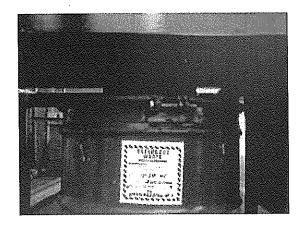
After pictures: Hazardous waste drum sludge has been removed from the same satellite accumulation area and a drop chute will be manufactured for the existing drum.

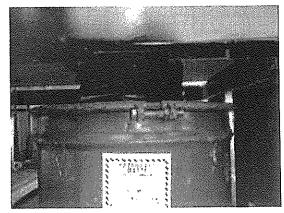


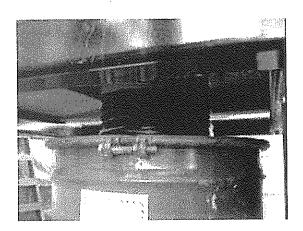
After pictures: Hazardous waste drum with drop chute installed to prevent spillage.













EC-2005-043

ISSUED DATE:

11/17/2005

Issued To: Corporate Relations (94)

Reported By: John Martin

Jan Carnahan

Environmental Engineering

Marketing and Graphics Assistant

Phone: (619) 544-3553 Fax: (619) 744-1088

Phone: (619) 544-8825 Mailstop: 211

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-043, to ensure that you meet the required deadline. Please reference EC-2005-043 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Photographic Department lab in Building 8. The following non-compliance item was noted that need corrective action:

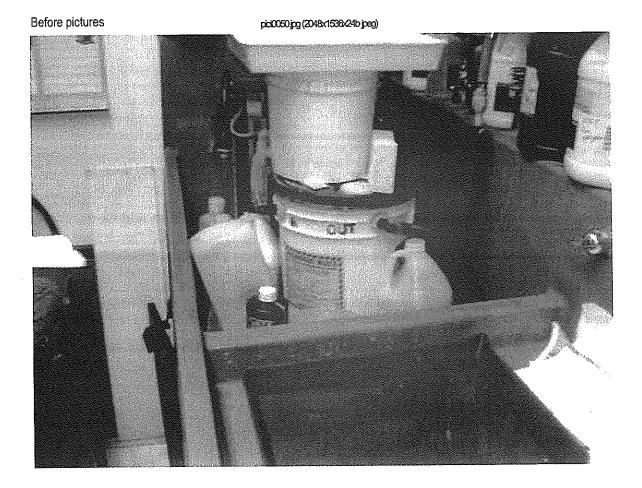
1. The HW label on the Silver recovery waste container was over the one year storage period for replacement.

Regulatory and/or EMS Reference:

Corrective Action Response:

Open requisition for service of three 5-gallon conisters for silver recovery systems. May X-Ray will be subcontracted for this service.

/s/ John Walden on 11/22/05.



(CSE)
NATIONAL STEEL AND SHIPBUILIDING COMPANY

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RECOMMENDED VENDOR: MERRY X-RAY CHEMICAL CORP.	
MRKK X NAT CARMITAN CONT.	
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PHONE 838-565-2409 FAX	

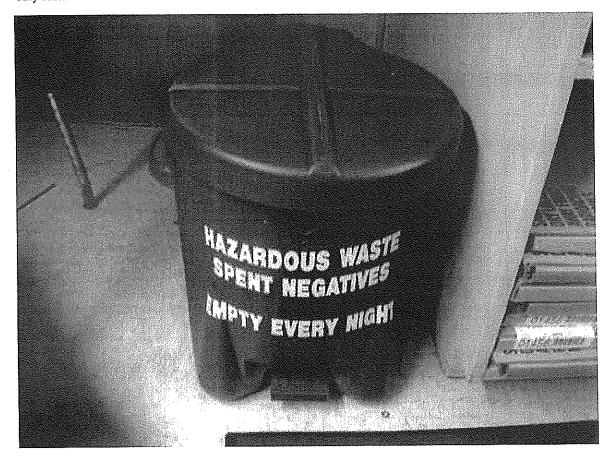
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CALL JUE#8433

TO NOVEMBER

After Picture: A temporary hazardous waste container has been implemented in the photo lab and will be emptied on a daily basis.





EC-2005-037

Issued To: Machining Division (3)

Randy Hurless

Phone: (619) 544-8434

Mailstop: 15

ISSUED DATE:

11/17/2005

Reported By: John Martin

Environmental Engineering Phone: (619) 544-3553 Fax: (619) 744-1088

Email: imartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-037, to ensure that you meet the required deadline. Please reference EC-2005-037 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Machine Shop. The following items were noted that need corrective action:

- 1. Proper aisle space between HW drums to allow for proper drum inspection to check for any leaks, proper labeling or damage to the drums.
- 2. Photographic negatives need hazardous a waste container with a lid. The container needs a hazardous waste label or label with the words hazardous waste and empty daily.

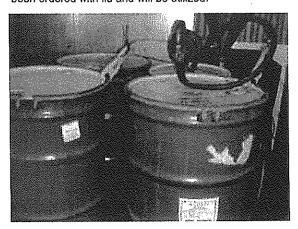
Regulatory and/or EMS Reference:

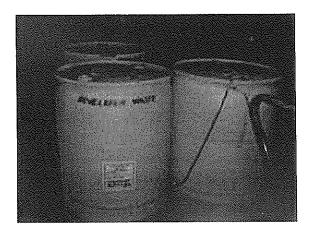
Corrective Action Response:

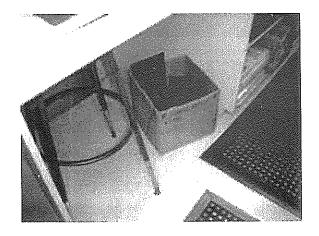
- 1b) Secondary containment (drums) will be moved to allow proper spacing and access to drums for inspections - COMPLETE
- 1b) Drums containing new and waste materials will be separated from each other COMPLETE
- 2) Photographic spent film will be handled in a flip top 10 gallon container and properly labeled "hazardous waste" to identify the contents. The container will be emptied daily - ECD 11/29/05

/s/ John Walden 11/22/2005

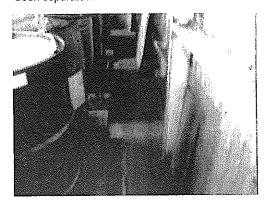
Before pictures: New containers for spent film have been ordered with lid and will be utilized.

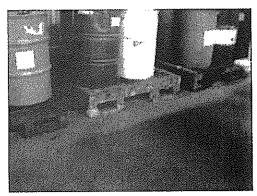






After pictures: The hazardous waste drums have been move to provide proper aisle spacing for drums inspections. New and waste material has been separated.











D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave a San Diego, CA 92110 Phone 619-276-9100 m Fax 619-276-9108 www.ddtool.com

After: Purchase requisition for spent film containers.

CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

Purchasing Fax: (619)398-8355

purchasing@ddtool.com

A/R Fax:

(619)398-1910

A/R E-mail

ar@ddtool.com

Sales Fax: (619)276-9199

Sales E-mail: expert@ddtooi.com

Suppliers Please Ship To:

D&D TOOL & SUPPLY - Br# 01

1028 Buenos Ave

San Diego, CA 92110

** Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ***

: JOHN WALDEN

Pax#

: 1-619-544-7901

From

: STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

** Fax **** Fax **

** ACKNOWLEDGEMENT **

Order #: S1453839

Rel# :

Printed: 09:45:59 23 NOV 2005

Page # : 1 of 1

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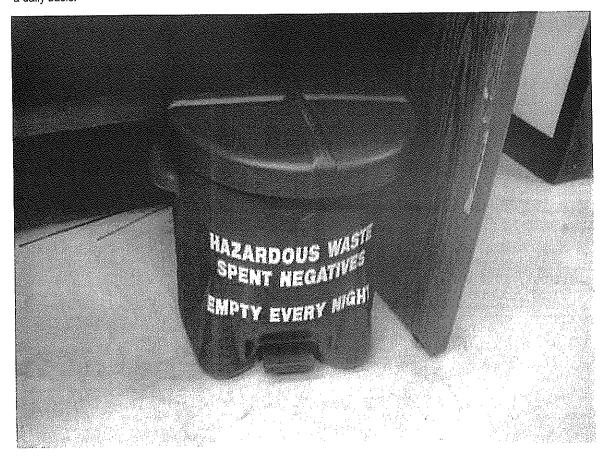
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619-544-8529

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			Total Amount		382.00

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After Picture: A temporary hazardous waste container has been implemented in the Label Shop and will be emptied on a daily basis.





Hugo Bermudez <hbermude@nassco.com> 12/01/2005 03:25 PM To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject RE: NASSCO Corrective Actions Update 2 of 5

2 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

EC ECAR 038 112905.pdf



EC-2005-038 ISSUED DATE: 11/17/2005

Issued To: Quality Assurance (80) Reported By: John Martin

Keith Londot

Manager, Quality Assurance Phone: (619) 544-8802

Mailstop: 10

Environmental Engineering Phone: (619) 544-3553

Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-038, to ensure that you meet the required deadline. Please reference EC-2005-038 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of NDT. The following items of non-compliance were noted that need corrective action:

- 1. Waste photographic chemicals need hazardous waste accumulation labels affixed to all storage containers.
- 2. Any waste photographic negatives will be placed in a container with a lid and have a hazardous waste label or a label with hazardous waste statement and empty daily wording will be attached to the container.

Regulatory and/or EMS Reference:

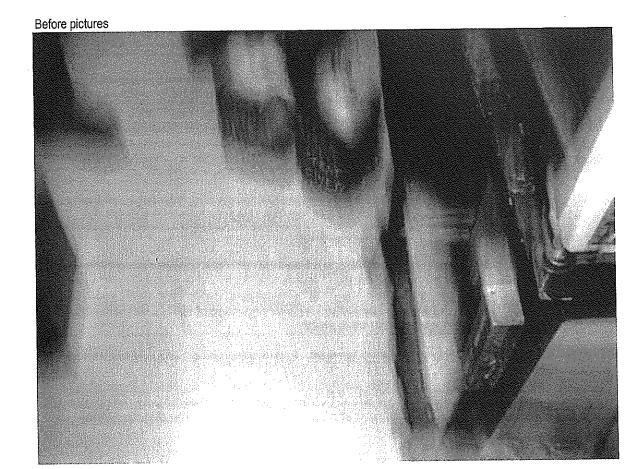
Corrective Action Response:

NDT Inspection Lab was generally unaware of the labeling requirements for spent film and developing chemicals.

Corrective actions have been accomplished on items 1 and 2:

- 1) A container will be purchased and marked "Waste Radiographic Film" and "Empty Daily.
- Containers for waste photographic fixer and waste photographic developer have been properly labeled with an approved hazmat label and marked "Empty Daily". Containers were also placed in secondary containment.

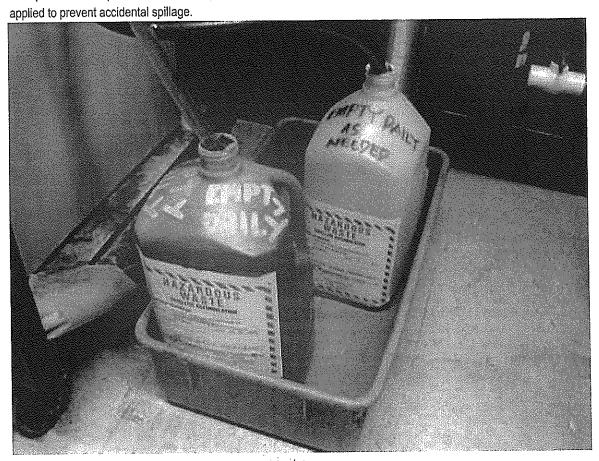
/s/ Bill Huston on 11/23/2005



After pictures: New containers for spent film have been ordered with lids and will be utilized.



After pictures: The spent fixer and developer chemicals have been properly labeled and secondary containment





D&D TOOL & SUPPLY

Corporate Office: 1028 Buenos Ave a San Diego, CA 92110 Phone 619-276-9100 a Fax 619-276-9108 www.ddtcol.com

After: Purchase requisition for spent film containers.

CUSTOMER / SUPPLIER Fax Cover Sheet

Contact us:

Purchasing Fax: (619)398-8355

purchasing@ddtool.com

A/R Fax:

(619)398-1910

A/R E-mail

ar@ddtool.com

Sales Fax: (619)276-9199

Sales E-mail: expert@ddtool.com

Suppliers Please Ship To:

D&D TOOL & SUPPLY - Br# 01

1028 Buenos Ave

San Diego, CA 92110

** Fax **** Fax **** Fax **** Fax **** Fax **** Fax **** Fax ***

To

: JOHN WALDEN

Fax#

: 1-619-544-7901

From

: STEVE FOX

Co. Name : NASSCO/P CARD

Message :

JOHN BOTH ITEMS IN STOCK L A THEY WILL BE HERE MONDAY !!!

** Fax **** Fax **

** ACKNOWLEDGEMENT **

Order #: S1453839

Rel# :

Printed: 09:45:59 23 NOV 2005

Page # : 1 of 1

619-276-9100 Fax 619-276-9199

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D & D TOOL & SUPPLY

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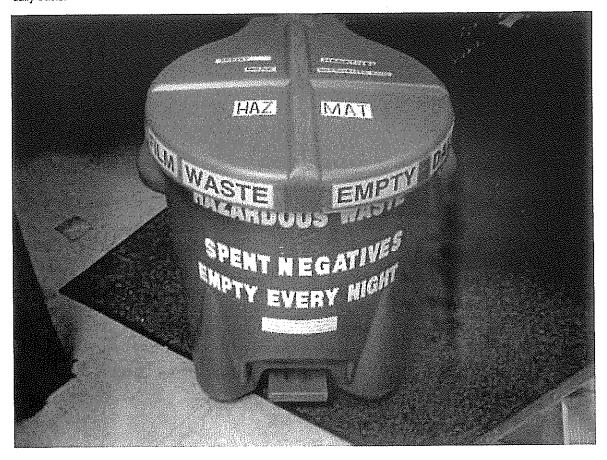
NASSCO/P CARD HARBOR DR & 28TH SAN DIEGO, CA 92113

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			SUBTOTAL		382.00
			Total Amount		382.00

^{..} Reprint .. Reprint .. Reprint ..

After Pictures: A temporary hazardous waste container has been implemented in the NDT lab and will be emptied on a daily basis.





Hugo Bermudez <hbermude@nassco.com> 12/01/2005 03:26 PM To "'Hugo Bermudez'" <hbermude@nassco.com>, Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject RE: NASSCO Corrective Actions Update 2 of 5

3 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 039 112905.pdf



EC-2005-039

ISSUED DATE:

11/17/2005

Issued To: Maintenance (62)

Reported By: John Martin

Mark Kukuchek

Environmental Engineering

Director T&T, Maint., Facilities Phone: (619) 544-8799 Phone: (619) 544-3553 Fax: (619) 744-1088

Mailstop: 38-A

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-039, to ensure that you meet the required deadline. Please reference EC-2005-039 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Maintenance area. The following items of non compliance were noted that need corrective action:

- 1. Large yellow used oil tank needs a daily inspection log to identify any leaks or waste in secondary containment area.
- 2. NiCad batteries were identified with lead acid batteries in the Maintenance battery storage area. NiCad batteries are required to be managed as Universal Waste. Batteries require a covered container for storage and a Universal Waste label.

Regulatory and/or EMS Reference:

Corrective Action Response:

BMP 111 "Universal Waste" does not cover proper separation of batteries, Ni Cads and Lead Acid.

Item 1) Set up daily log thru 12/31/06, also added tank check to maintenance daily housekeeping walkthroughs.

Item 2) Correctly sorted batteries, disposed of Ni Cads batteries as universal waste, also set up covered plastic waste drum as "Universal Waste" for future NiCad battery disposal.

Set up training for supervision to better identify hazmat and handling.

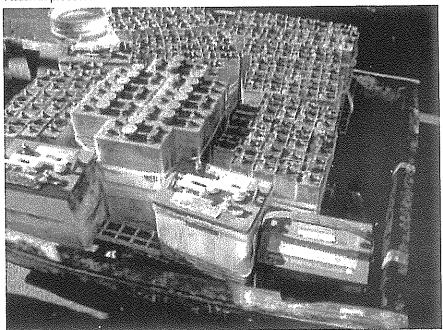
/s/ Carl Whitaker on 11/22/2005

Before Pictures: A new tank inspection checklist has been generated and implemented for the oil tank.



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Action in process:



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war			- Bins, shelves & cabinets are not overloaded	127 V 75 W	173022
			- Material and equipment are stored and organized — Person Interdict - Bins, shelves & cabinets are not overloaded - Obsolete fixtures, tools & materials are sent to reclamation — Bins — Other Properly stored and organized issues	and and and and	7. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z. Z.
	,		- Officer Property stored and organized issues 7 14/207	C-	
			General Clean Up		
مستمعي			- Work areas, roadways & walkways, are swept up and clean	, , , , , , , , , , , , , , , , , , ,	Maria and Maria and America . The Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Control of the Co
			- All debris, trash, paper, cans, wood, & dirt are cleaned up		
2000			- All trash collection containers are less than 3/4 full.	TAX AND PROBLEM REPORTED AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION AND ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE BEREION ADDRESS OF THE	
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	حمدتي		- Bldg 8- East - Old door needs to be through a	1 12-4 9	1 -
سد.	\ 		- Machinery is clean, leak free, and in safe working condition Haywald Areas around machinery is free of debris and clear access - All electrical covers are in place.	Box & Stran Pit-	1 Anac
	7		- Areas around machinery is free of debris and clear access 4-3 44	great guns hanging o	n side)
			7 th Citatinod, bottore are at place		
			- Transportation equipment is leak free	as (any special a beautifular or proper property a blancher, and an order beautiful any on the plant of beautiful as a plant of the special baselies and the special baselies and the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special baselies as a plant of the special	M. T. WAS IN THE CONTRACTOR OF STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND STREET, AND
			Hazardous waste and materials		
	_		- Recyclable material is properly separated.		
		 -	- Hazardous waste is separated from general trash		
سسيم			- Secondary containment are free from liquids and rain water .	S. Marie and Accompany of a management of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of th	
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	1		Hazardous waste labels	*	,
سمب مزاد است		ļ	Inspect labels for compliance, properly filled out Labels are legible and easy to read	Comments appeared a series and series for the substances of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series of the series o	The second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second secon
			- Labels are legicle and easy to read - Labels indicate proper date, name of hazard, etc.	The second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second secon	
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1 200			- Containers in non satellite areas have start date less than 30 days old	Commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of the commence of th	to the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second se
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	!	1	1- 11 11 Empty Trash in Smoking of	Irr 5	1/425

Where do we dispose of Contaminated muterials such as.
Parr Grandle Plastic, woodete.

			Housekeeping Checklist		
Loca	a/I	911	1 Inspected by: 1 Sainte 6 43056		tion Date:
ок	Not OK	ÑΑ	Housekeeping Item Description	Corrective Measure	Assigned Date Completed
		,	Area Hazards - Crane rails are free of grease - Lines, leads, and hoses are properly routed and organized - Standing water is removed from the work area		
د. سمسا سسب			Area Access - Designated walkways are clear and unobstructed - Fire lanes are clear and unobstructed - Access ladders are cleared at both top & bottom - Storm drains are clear and unobstructed		
ا میمید امیدی است	<i>ا</i>		Material Storage - Material and equipment are stored and organized - Bins, shelves & cabinets are not overloaded — 1312- CUNE - Obsolete fixtures, tools & materials are sent to reclamation - Other: Properly stored and organized issues	Bench Clutter	Kuis
en.	د		General Clean Up - Work areas, roadways & walkways, are swept up and clean - Ail debris, trash, paper cans, wood, & dirt are cleaned up - All trash collection containers are less than 3/4 full. - All skip tubs are emptied as required	Bread Tuble miles	Kris
0.7	4 <u>-</u>	Agent Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Communication of the Com	Equipment Maintenance - Machinery is clean, leak free, and in safe working condition - Areas around machinery is free of debris and clear access - All electrical covers are in place - Transportation equipment is leak free	Bun (sque derty	Sin E
ا مساد است	المنية		Hazardous waste and materials - Recyclable material is properly separated. - hazardous waste is separated from general trash - Secondary containment are free from liquids and rain water	m. and overfilled	Ca.l
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	Housekeeping Checklist					
Local		TIM.	Forme 6 Badge #:			
οк	Not OK	ΝÁ	Housekeeping Item Description	Corrective Assigned Date Measure To Complete		
=		سرے	Area Hazards - Crane rails are free of grease - Lines, leads, and hoses are properly routed and organized - Standing water is removed from the work area			
			Area Access - Designated walkways are clear and unobstructed - Fire lanes are clear and unobstructed - Access ladders are cleared at both top 3 bottom - Storm drains are clear and unobstructed	304 Jang		
	niconordi.	A MARINE WY	Material Storage - Material and equipment are stored and organized - Bins, shelves & cabinets are not overloaded - Obsolete fixtures, tools & materials are sent to reclamation — BZINEA - Other Properly stored and organized issues	F-File (interest) Emigr)		
			General Clean Uo Work areas, roadways & walkways, are swept up and clean 7/5 Conner All debris, trash, paper, cans, wood & dirt are cleaned up 2/2/2/2/2 All trash collection containers are less than 3/4 full. All skip tubs are emptied as required			
	L:	and in	## Page 15 Comment Maintenance - Machinery is clean, leak free, and in safe working condition. - Areas around machinery is free of debris and clear access - All electrical covers are in place - Transportation equipment is leak free	and Samiforender and Carl		
·-			Hazardous waste and materials - Recyclable material is properly separated ZAG Dyum C - Hazardous waste is separated from general trash - Secondary containment are free from liquids and rain water - Flom Locker in Dulk strage has (encourse S Hazardous waste labels - Inspect labels for compliance, properly filled out	AND ADDRESS OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE PARTY OF THE		
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οκ	Not OK	T	Housekeeping Item Description	Corrective Measure	Assigned Date To Completed
		1	Area Hazards		
			- Crane rails are free of grease	. W separation	
			- Lines, leads, and hoses are properly rouled and organized	ander from an area, as a commenced.	and the contract of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second
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			Area Access		
	~ ~ ~ ~ ~ ~ ~		- Designated walkways are clear and unobstructed		
			- Fire lanes are clear and unobstructed		
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			General Clean Up - Work areas, roadways & walkways, are swept up and clean		. a
		2000, 1909 F.F., -10000 by MA	- work areas, roadways a walkways, are swept up and clean - All debris, trash, paper, cans, wood, & dirt are cleaned up	and the second second department of the Mr. Sheat and St. St. St. St. St. St. St. St. St. St.	ALAMAN MARKATAN PERSONAL CONTRACTOR OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PROPERTY OF THE PRO
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secondary containment, sump, etc.) is in poor condition or unfit for service, the tank system operator must take proactive steps to inspector review, and kept for at least 3 years. If the tank system or a component of the tank system (i.e. piping, pumps, valves, 66265.195. Generators of hazardous waste that are large quantity generators or onsite waste treatment operations using a tank system to investigate, repair, and/or replace the equipment, parts, or components as required in section 66265.196 of Title 22 CCR manage waste are required to conduct these inspections. The tank system inspection records are required to be onsite, available for tank system operator or owner is required on a daily basis pursuant to the California Code of Regulations (CCR), Title 22, section instructions: This form may be used to conduct the required self-inspection of a hazardous waste tank system. The inspection by the

Title 22 CCR, §66265.195 Tank System Inspections

- (a) The owner or operator shall inspect, where present, at least once each operating day:
- working order, (1) overfill/spill control equipment (e.g., waste-feed cutoff systems, bypass systems, and drainage systems) to ensure that it is in good
- (2) the aboveground portions of the tank system, if any, to detect corrosion or releases of waste;
- ensure that the tank system is being operated according to its design; (3) data gathered from monitoring equipment and leak-detection equipment, (e.g., pressure and temperature gauges, monitoring wells) to
- containment structures (e.g., dikes) to detect erosion or signs of releases of hazardous waste (e.g., wet spots, dead vegetation); and (4) the construction materials and the area immediately surrounding the externally accessible portion of the tank system including secondary
- (5) for uncovered tanks, the level of waste in the tank, to ensure compliance with section 66265.194(b)(3)
- are functioning properly (b) The owner or operator shall inspect cathodic protection systems, if present, according to, at a minimum, the following schedule to ensure that they
- thereafter, and (1) the proper operation of the cathodic protection system shall be confirmed within six months after initial installation, and annually
- (2) all sources of impressed current shall be inspected and/or tested, as appropriate, at least bimonthly (i.e., every other month).
- section. (c) The owner or operator shall document in the operating record of the facility an inspection of those items in subsections (a) and (b) of this

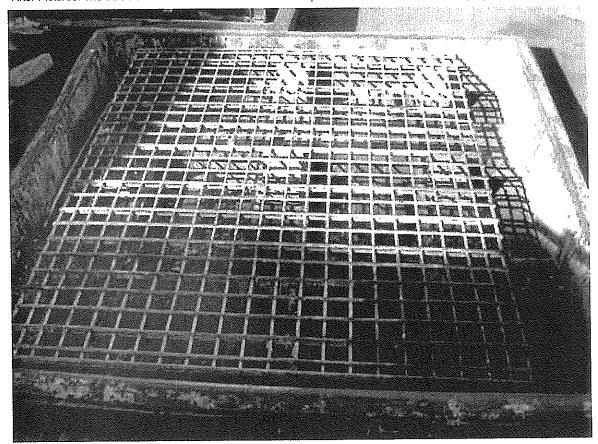
HAZARDOUS WASTE TANK SY TEM DAILY INSPECTION LOG

(AS REQUIRED BY 22 CCR 66265.195)

Business Name: NASSCO Year: 2005												
	iness Addres		798 HARBO	R, SAN DII	EGO, CA					Tanl	System ID: _	USED OIL BLD 26
D A Y	Is 2 ^{ndary} containment free of waste and liquid?		Is the system free of corrosion And evident damage?		Are pipes, valves and pumps free of leaks and in good condition?		Do open tanks have at least 2 ft. of free board?		Are leak detection program/ equipment working?		Inspected by	Comments
	YES	NO	YES	NO	YES	NO	YES	NO	YES	NO		
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2												;
3												
4												
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30							<u></u>					
31					-							

Month: NOV

After Pictures: The batteries have been sent to the hazmat department as universal waste for proper disposal.





Hugo Bermudez <hbermude@nassco.com> 12/01/2005 03:28 PM To "'Hugo Bermudez'" <hbermude@nassco.com>, Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject RE: NASSCO Corrective Actions Update 4 of 5

4 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

EC ECAR 041 112905.pdf



EC-2005-041 ISSUED DATE: 11/17/2005

Issued To: Warehouse (55) Reported By: John Martin

Robert Trick

Manager, Steel Production Control

Phone: (619) 544-7588

Mailstop: 37

Environmental Engineering

Phone: (619) 544-3553 Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-041, to ensure that you meet the required deadline. Please reference EC-2005-041 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of the Haz-Mat Department. The following items were identified as non-compliance that need corrective action:

- 1. Waste Ni Cad batteries were not in proper storage container and had no Universal Waste labels on containers
- 2. Waste fluorescent tubes were not in proper storage containers and had no Universal Waste labels
- 3. Tri-Sodium Phosphate waste containers had HW label with end accumulation date over 90 day storage period.
- 4. Dave Power's employee job description does not provide haz-mat responsibilities
- 5. Drum storage area does not have the proper aisle space

Regulatory and/or EMS Reference:

Corrective Action Response:

Items 1-3

Universal wste containers for the batteries and tubes were delivered. Ashland to complete disposal by 12/08/05.

Ashland provided a profile for the TSP. Waste was disposed of on 11/28/05.

Min-Max for universal waste containers and labels to be established . ECD 11/30/05.

Dave Power was instructed to report hazmat exceptions to management and be reviewed weekly at the steel yard white board. Completed 11/28/05.

Item 4

see attached Warehouseman job description and training log.

Item 5

Drums congesting the area were dumped per procedure as of 11/28/05 allowing complete access to all drums. Drum processing recommended to occur weekly instead of every three weeks. ECD 12/01/05.



Environmental Corrective Action Request (ECAR)

/s/ Robert Trick on 11/29/2005

Before pictures



PICT0036.JPG 2048x1536x24bjpag



PICT0067JPG 2048x1536x24bjpeg



PICT0068.JPG 2048x1536x24bjpeg



PICT0069JPG 2048/1536/24bjpeg



PICT0070JPG 2048x1536x24bjpsg



PICT0072JPG 2048x1536x24bjpeg



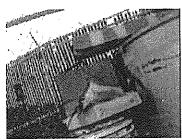
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PICT0074.JPG 2048x1536x24bjpeg



PICT0075JPG 2048x1536x24bjpsg



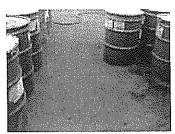
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PICT0077JPG 2048x1536x24bjpsg

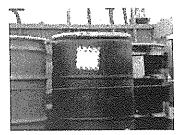
After Pictures: The following items have been addressed: Hazwaste drums have been moved and now have proper aisle spacing, NiCad batteries and fluorescent tubes have been placed in proper containers and labeled as universal waste, Tri-Sodium waste have been properly labeled and scheduled for pick up on November 30, 2005, Dave Power job description and training has been provide below.





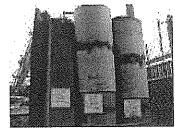


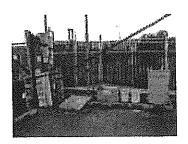




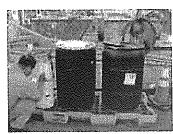


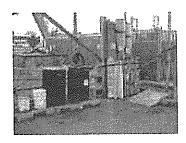


















To: M. ke Chee Fax 1088

From: Bol Trick x-7588

Z projed

THEBED & COUNTY

November 24: 1992

WAREHOUSEMAN

Job descriptions for Dave Power of the Hazmat Department including ongoing training classes.

In order for a Journeyman Warehouseman to obtain a rating of "2" for ability, he/she must posses the following basic abilities Anything less will be classified as a "1".

BASIC ABILITIES

- 1. Successfully pass the NASSCO Journeyman Forklift Operators examination. Be able to operate three of the following industrial fork truck types:
 - Gasoline/diesel powered yard truck.
 - Propane/Electric powered Receiving dock truck.
 - Electric Warehouse Stacker/Reach truck.
 - Electric OrderPicker or Narrow Aisle (Man-up) trucks.
- Read, write and understand English. Must have legible hand writing.
- 3. General math skills (addition, subtraction, multiplication and division).
- 4. Basic understanding of NASSCO's computerized Materials and Inventory Systems.
- 5. Unpack and inventory inbound material, match to packing slips, freight bills and other documentation.
- 6. Determine proper storage locations, store material and update the computer system.
- 7. Maintain quantity and location accuracy of NASSCO owned and Contract owned inventory.
- 8. Pick and process material issues using manually written and computer generated documents.
- 9. Able to repetitively lift 50 pounds.

ADDITIONAL ABILITIES

In order for a Warehouseman to obtain a rating of "3" for ability, he/she must have all of the basic abilities, plus ALL of the additional abilities listed below.

1. Prepare appropriate documents (i.e. Transportation/Damage Report (TDR), Over/Short & Damaged reports (OS&D), Material Return Adjustment (MRA), etc.)

- 3. Recommend adjustments to stock levels, reorder points; and order quantities.
- Solve difficulties such as issue quantity discrepancies. 4. marking/tagging errors, transportation/delivery errors. location/quantity discrepancies!
- 5. Understand and effectively use advanced Materials/Inventory and Planning/Production computer systems to organize work and research material demands
- б. Expertise in unique processes and procedures for at least 8 of the following material types:
 - N/C Schedule A GFM or owner furnished
 - N/C Material Order Schedule (MOS)
 - N/C Fabrication Order Schedule (FOS)
 - N/C Steel and Pipe
 - N/C Spares/Fitting out materials
 - N/C Electrical Cable
 - N/C Non-spec material
 - NASSCO owned Min-Max and Surplus Inventories
 - Ship Repair GFM
 - Ship Repair CF material
 - Maintenance, Repair and Operating Materials
 - NASSCO Archives
 - Hazardous Materials (HAZMAT)
- 7. Must have significant cross-trade abilities as a Tool Room Attendant, Material Chaser, or pass the journeyman's test to operate an overhead, tower, or portal crane.
- Understands common 8 material identification ୯୦ଝିଞ୍ଚ symbols, grades, and sizes. Able to employ material inspection techniques with this knowledge.
- 9. Able to operate all warehousing forklift trucks listed in the basic requirements.

A Warehouseman may be classified a "3" by also knowing ALL of the basic requirements, plus have passed the basic journeyman assessment test of another major trade, listed below:

- Inside Machinist
- Electrician
- Outside Machinist
- Sheet Metal

Welder

Shipfitter

- Pipefitter

A Warehouseman may be classified a "4" by obtaining required abilities to qualify him/her as a "5" plus pass a basic journeyman assessment test of another major trade as listed above.

Hugo Bermudez

From: Chad Haza [chaza@nassco.com]

Sent: Tuesday, November 22, 2005 9:10 AM

To: 'Hugo Bermudez'

Subject: D. Powers | NASSCO Training

Dave Power 50698

Course	Completion	Session
ENV-10: HazMat Coordinator Training Refresher 2005	06/22/2005	С
RCRA/DOT Training, 40 CFR 262.34 & 49 CFR 172.700: 2005	06/23/2005	Α
ENV-10: HazMat Coordinator Training Refresher 2004	04/21/2004	С
ENV-10: HazMat Coordinator Training Refresher 2003	05/13/2003	С
ENV-01: HazMat Coordinator Training 2002	07/31/2002	E
2005 SPCC Briefing 40 CFR Part 112	09/29/2005	Α

Chad Haza

Environmental Administrator
National Steel and Shipbuilding Company
T 619.544.8826
F 619.744.1088
mailto:chaza@nassco.com



To "'Hugo Bermudez'" <hbermude@nassco.com>, Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject RE: NASSCO Corrective Actions Update 5 of 5

5 of 5 - Final

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



EC ECAR 044 120105.pdf



Environmental Corrective Action Request (ECAR)

EC-2005-044 ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16) Reported By: John Martin

Judie Blakey Superintendent, Production Phone: (619) 544-8443

Mailstop: 02

Environmental Engineering Phone: (619) 544-3553 Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Paining area - Paint Storage. The following item of non-compliance were noted that need corrective action:

- 1. A number of one gallon paint containers has no expiration dates on the paint containers.
- 2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

Regulatory and/or EMS Reference:

Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

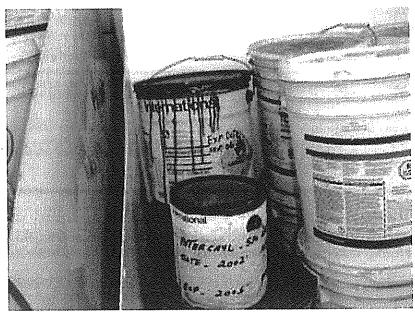
Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

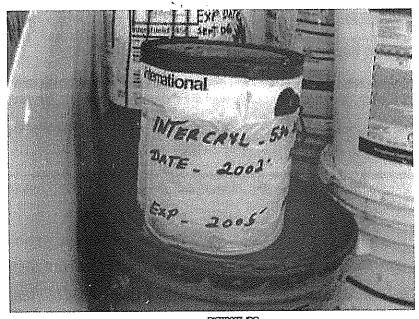
All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint is attached to this report and the paint is indicated by "Paint Solids" on the manifest.



PICT0086JPG 2048x1536:24bjpeg



PICT0087.JPG 2048x1536x24bjpeg

Before pictures: Paint Storage log lists all paints and expiration dates, expired paints are removed from the log and sent to

hazmat for proper disposal. This form was last updated on November 29, 2005.

hazmat for proper disposal. This form was	i last upua				
Paint Storage Inventory Controlled					
Est are a Substitution and a substitution of the	eirYiin	โลหูกเหลขอก -			
		(Dale)	Hall Specific	? Remarks:	
international Paint:					
Interclene 245-BRA570 (Blk)	170	Feb-2007	Y-BP	Underwater Hull	
Interclene 245-BRA572 (Red)		Feb-2007	Y-BP	Underwater Hull	
Interspeed 640-BRA640 (Red)		Jan-2007	Y-T-AKE	Underwater Hull	
Interspeed 640-BRA640 (Red)		Jul-2007	Y-T-AKE	Underwater Hull	
Interspeed 640-BRA642 (Blk)	84	Nov-2006	Y-T-AKE	Underwater Hull	
Interspeed 640-BRA642 (Blk)	55	Dec-2006	Y-T-AKE	Underwater Hull	
Interspeed 640-BRA642 (Blk)	45	Sept-2006	Y-T-AKE	Underwater Hull	
Intercryl 530-DK Brown	9	Sept-2005	N	The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s	
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Intercryl 530-Signal Blue	15	Sept-2006	N	Moreover programments has been assembled statement and the second of the programment of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second of the second o	
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Interline 92503-Buff	55	Mar-2006	Y-T-AKE		
Interplate 997-Nippe	5	Dec-2006	N	happing the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state	
Intershield 556-DK Gray	5	Jan-2007	N	Need 1 gl of reactor	
Interthane 990-Red	7	Aug-2007	N	. The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the	
Intertuf 262-KHA302 (Gray)	10	Apr-2007	N		
Intergard 403-KBA401(Off White)	10	Mar-2006	N	Need 2 gls of reactor	
Intergard 631-Gray		Dec-2006		Upgrade commercial non-skid	
Intergard 621-DK Gray	5	Jan-2007	N	Non-skid EK5040H	
Interline 624-THA664 (Red)	75	Jun-2007	Y-T-AKE	and the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of t	
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F-34 Binder	5	Feb-2007	N	CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR OF THE CONTRACTOR O	
26307-Bulkhead Gray	5	Feb-2007	N	and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	
F-42 Med Yellow	4	Feb-2007	N	The second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second secon	
F-1000 White	3	Feb-2007	N	4 A A A A A A A A A A A A A A A A A A A	
F-424 Pure White	1	Feb-2007	N	N. MARKAN MARKAN MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA MARKA	
10-Black	1	Feb-2007	N	and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second s	
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Devoe:	Angunga interests debution is 17 this	and when the second supplementary and the second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second second se	and a balance of the company majoring may be desired that the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the control of the cont	rain a rainger angenera and in the recompany administrator contract polarista as a victor a responsibility.	
PSX700-Safety Blue	A SECURE OF CONTRACTOR	Sept-2006	Y-T-AKE	The state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the s	
PSX700-Safety Red		Nov-2006	Y-T-AKE		
PSX700-Safety Yellow		Oct-2007	Y-T-AKE		
PSX700-Safety Red		Apr-2007	Y-BP	And the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of t	
PSX700-Black		Apr-2007	Y-BP		
PSX700-Black		Jun-2007	Y-T-AKE	Market of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the stat	
PSX700-White	30	Feb-2008	Y-T-AKE	The same properties and the properties of the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states and the same states are same states are same states and the same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same states are same	
				Asphalt paint for walk-ways	
Sherwin Williams-W	WWW.770			Naprialit paint to wait-ways	
Sher-cryl-Safety Blue	Acres and a second	Jul-2007	N	and the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of the state of t	
Sher-cryl-Safety White		Jul-2008	N		
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Work Instruction No.: 103

Revision: D

Approved:	/s/
	Judie Blakey
	Superintendent, Blast, Paint, and General Services

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Revision Record						
Revision	Date	Description of Change				
	12/18/98					
Α	2/01/99	Process flowchart, along with referencing text, updated. Also, minor editorial change.				
В	6/01/99	Attachment (4) revised. Also, minor editorial changes.				
С	12/01/01	Reference to coating material approval added in para 6.1.1; handling of expired products added as para 6.4; Paint Usage form updated and set in landscape.				
D	12/21/01	Re-Issue				

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1.0. Purpose:

To provide instructions for the management of coating products.

2.0. Scope:

All management of coating products in all stages of construction.

3.0. References:

- (a) NASSCO Blast, Paint, and General Services, Procedure No. 2, Surface Preparation and Paint
- (b) NASSCO Safety Manual, Hazardous Communication, Section 800
- (c) NASSCO Environmental Engineering, Procedure No. 3, Hazardous Materials/Waste Transportation Tracking
- (d) NASSCO Environmental Engineering, Procedure No. 12, Hazardous Waste Satellite Accumulation
- (e) San Diego Air Pollution Control District (APCD) Rules and Regulations
- (f) San Diego Air Pollution Control District (APCD) Permit to Operate 007657, Primeline
- (g) San Diego Air Pollution Control District (APCD) Permit to Operate 911437, Wood Products

4.0 Definitions:

None

5.0 Responsibility:

The Superintendent of Blast, Paint, and General Services is responsible for ensuring that this work instruction is implemented and followed. Additional responsibility is assigned in Reference (a).

6.0 Procedure:

- 6.1 Receipt
- 6.1.1 The process of receiving coatings from the coating supplier is detailed in Attachment (1), Receipt and Delivery of Coating Products Flow Chart.
- 6.1.2 The Paint Supervisor or Hazardous Material Coordinator at the satellite storage areas verifies, on receipt and/or delivery, that coating batch numbers are current. To aid verification, Attachment (2), Paint Batch Numbers Reference Tables for Paint Production, shall be posted in all satellite storage areas.
- 6.2 Handling
- 6.2.1 All coatings, approved according to Reference (b), are handled according to the coating manufacturer's Material Safety Data Sheet (MSDS). Copies of MSDS's are maintained by the Industrial Hygiene department.



Storage

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MANAGEMENT OF COATING PRODUCTS

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0.5	Storage
6.3.1	All coatings are stored according to the coating manufacturer's Product Data Sheet (PDS) and Material Safety Data Sheet (MSDS). Copies of applicable PDS's are maintained by the Industrial Hygiene department.

- (1) Request through the department Material Coordinator that the coating supplier extend the shelf life of the coating and mark the product container as "Shelf Life Extended." The Material Coordinator shall maintain the paperwork.
- (2) Mark the product as "For Maintenance Use Only."

(3)

- 6.4 Issue and Usage
- 6.4.1 Paint production will use the Paint Issue form (Attachment (3)) to order coating materials and the Paint Usage form (Attachment (4)) to record weekly use.
- 6.4.2 The department Material Coordinator will maintain the data from the issue and usage forms in their paper form and/or in a like database.
- 6.4.3 The department Material Coordinator will support the usage record keeping and reporting requirements defined in Reference (e), for the following coating operations:
 - (1) Architectural Coatings (Rule 67.0)
 - (2) Metal Parts and Products Coating Operations (Rule 67.3)
 - (3) Wood Products Coating Operations (Rule 67.11)
 - (4) Marine Coating Operations (Rule 67.18)
 - (5) Motor Vehicles and Mobile Equipment Refinishing Operations (Rule 67.20)
- 6.4.4 In addition to the requirements defined in paragraph 6.4.3 above, the Material Coordinator or the SOC 1 Paint Supervisor shall ensure that the maximum usage requirements for the Primeline and Wood Products Operations, detailed in References (f) and (g), are not exceeded.
- 6.5 Paint Waste Management
- 6.5.1 Paint waste will be managed as detailed in References (c) and (d).

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7.0 <u>Attachments</u>:

- (1) Process Flowchart for the Request and Delivery of Paint
- (2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)
- (3) Paint Issue Form
- (4) Paint Usage All Areas Form (SAMPLE)



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(1) Process Flowchart for the Request and Delivery of Paint

PRODUCTION

MATERIAL COORDINATOR

SUPPLIER

Review Long Range Schedules (1) Determine Pallets to Release (2)

> Extract Pallets From Internal Spreadsheet (3)

Approve Release Against Purchase Order (4)

Fax or Email Approved Releases to Coating Supplier (5) Kit Material Per Request (6)

Review
Approve/Disapprove
Receivers and Deliver
to Material
Coordinator
(8)

Update Internal Spreadsheet (9)

Deliver Material (7)

Post Receivers (10)

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(2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)

TABLE 1. IDENTIFYING YEAR AND MONTH INFORMATION FROM BATCH NUMBERS

COATING	EXAMPLE BATCH #	YEAR CODE	YEAR	MONTH/DAY CODE	MONTH .
AMERON	LR 2002 0 1 3 2 7 0	2002	2002	01	JANUARY
DEVOE	LR 2002 0 5 0 2 0 8	2002	2002	05	MAY
INTERNATIONAL	2 M 6 6 4 6 U U A 6	2	2002	M	DECEMBER
INTERNATIONAL	CB1234UHA1	С	2002	В*	FEBRUARY
PROLINE	7670C2	2	2002	С	MARCH
SHERWIN WILLIAMS	PM0502A	2	2002	050**	FEBRUARY 20
SIGMA	0208-0011	02	2002	08	AUGUST

^{*}INTERNATIONAL REVISED ITS BATCH NUMBERING SYSTEM BEGINNING IN JANUARY 2000. FOR BATCHES PRIOR TO THAT DATE THE OLD SYSTEM IS STILL IN AFFECT.

**SHERWIN WILLIAMS IDENTIFIES THE BATCH BY YEAR AND BY DAY OF THE YEAR. IN THE EXAMPLE ABOVE, ?050" IS THE FIFTIETH DAY OF 2002.

TABLE 2. IDENTIFYING MONTH OF MANUFACTURE, MAIN COATING SUPPLIERS

INTERNATIONAL**	PROLINE	AMERON, DEVOE, AND SIGMA
A = JANUARY	A = JANUARY	01 = JANUARY
B = FEBRUARY	B = FEBRUARY	02 = FEBRUARY
C = MARCH	C = MARCH	03 = MARCH
D = APRIL	D = APRIL	04 = APRIL
E = MAY	E = MAY	05 = MAY
F = JUNE	F = JUNE	06 = JUNE
G = JULY	G = JULY	07 = JULY
H = AUGUST	H = AUGUST	08 = AUGUST
J = SEPTEMBER	I = SEPTEMBER	09 = SEPTEMBER
K = OCTOBER	J = OCTOBER	10 = OCTOBER
L = NOVEMBER	K = NOVEMBER	11 = NOVEMBER
M = DECEMBER	L = DECEMBER	12 = DECEMBER

^{**}INTERNATIONAL DOES NOTUSE THE LETTER'I'

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(3)	Paint Issue Form
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PAINT ISSUE

TO FROM DATE

DELIVERY LOCATION

CHARGE NUMBER

PAINT/	AMOUNT	UNIT, ZONE,					BATCH NUMBER	
SOLVENT	(GALS	COMPARTMENT, TANK NUMBER	FEET	SENT	PAINT	GALS	CONVERTOR REACTOR	GALS
				,				

SUPERVISOR'S SIGNATURE	
SHIPPER'S SIGNATURE	

- 1. FILL OUT THIS FORM COMPLETELY. USE SEPARATE SHEET FOR EACH CHARGE NUMBER.
- 2. SUBMIT COMPLETED FORM TO MATERIAL COORDINATOR/SR PLANNER SCHEDULER.
- 3. PAINT WILL BE DELIVERED ACCORDING TO JUST IN TIME SCHEUDLE.

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FROM	

- 4. SECOND SHIFT MUST FILL OUT THIS FORM AND LEAVE IT IN THE MAILBOX OF THE MATERIAL COORDINATOR.
- 5. BATCH NUMBERS ARE PROVIDED BY THE PAINT SHIPPER.
- Paint Usage All Areas Form (SAMPLE) (4)

DATE:		RULE:	(CIRCLE)	MARINE	ARCH	METAL	MOOD
LOCATION:							
SUPERVISOR/SUBCONTRACTOR:							

REF	VENDOR NAME	PRODUCT NAME	VOC	GALLONS	USED E	ACH DAY	AND TO	TAL FOR	WEEK			METHOD	USED (R S)	EPORT II	4
NO				MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL	AIRLES S	CONV	HVLP	R/B
1	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-10C													
2	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-2000 (MS 200)													
3	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-375G													
4	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-400G						SA	MF	PLE					
5	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-50					T	····	T		r			1	_
6	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-5C													
7	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-7C													
8	AMERON PROTECTIVE COATINGS	923 (SOLVENT)		1											<u> </u>
9	AMERON PROTECTIVE COATINGS	AMERCOAT 101 (SOLVENT)										<u> </u>			
10	AMERON PROTECTIVE COATINGS	AMERCOAT 15 (SOLVENT)													
11	AMERON PROTECTIVE COATINGS	AMERCOAT 182						<u>.</u>			<u> </u>				ļ
12	AMERON PROTECTIVE COATINGS	AMERCOAT 275E										<u> </u>			

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13	AMERON PROTECTIVE COATINGS	AMERCOAT 277E	1		1				 	ļ	
14	AMERON PROTECTIVE COATINGS	AMERCOAT 3203									
15	AMERON PROTECTIVE COATINGS	AMERCOAT 3234									

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IN CASE OF EMERGENCY OR SPILL, CALL THE NATIONAL RESPONSE CENTER 1.800-424-8802; WITHIN CALIFORNIA, CALL 1.800-852-7550



To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject RE: NASSCO Corrective Actions Update for December 7,

History:

P This message has been replied to.

Clint:

ECAR 041: Disposal of the remaining materials in the hazmat area has been completed.

ECAR 043: Disposal of all silver recovery material has been completed and schedule implemented for future service.

Corrective actions have been taken and action plans have been implemented. As of today, all items have been completed.

If you have any questions or need clarification please don't hesitate to call me at 619 544 7780 or cell 619 997 2690.

Hugo

----Original Message-----

From: Hugo Bermudez [mailto:hbermude@nassco.com]

Sent: Thursday, December 01, 2005 3:24 PM

To: 'seiter.clint@epa.gov'

Cc: 'John.Kolb@sdcounty.ca.gov'

Subject: NASSCO Corrective Actions Update 1 of 5

Clint:

Attached please find the updated corrective action forms indicated by a date. All items have now been completed except for the following:

ECAR 041: Some materials in the HazMat area have not been picked up by the disposal facility transporter as profile are currently being developed for the waste. This action is scheduled to be completed early next week.

ECAR 043: Currently scheduled to have Mary X-Ray (contractor) pick up and dispose of the silver recovery material in the photo lab and scheduled for 12/02/05.

As per our telecom, the paint was still within the 90 days after the expiration date. In addition, I have provided (attached to ECAR) Work Instruction 103 from the Paint Department which describes the management of expired paints and the paint inventory log. Please note that the Work Instruction was first issued December 1998 with a revision in December 2001 to include the handling of expired paints. All the paints have an expiration date either hand written on the container or printed bar code from the manufacture as described in the work instruction. I will provide you with a copy of the last paint inventory tomorrow as paint department personnel are gone for the day.

There are additional emails following this as I could not get all in one email due to size (5 total).

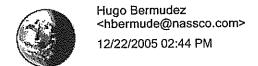
I forgot to ask in my last note if you wanted me to copy James Polek?

Please, if you have any questions or need clarification don't hesitate to contact me direct at 619 544 7780, cell at 619 997 2690 or via email.

Have a great weekend,

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection Update | 1 of 5

Clint:

Per your request, I have provided documentation for the items we discussed during our telecom on 12/14/2005.

I have attached disposal manifests for the following items:

- Fluorescent Light Tubes (fenced hazmat area)
- Non-PCB Light Ballasts (fenced hazmat area)
- Tri-Sodium Phosphate (fenced hazmat area)

The accumulation start date on containers inside the gated hazmat area reflect the date when the containers arrived at hazmat.

I have provided disposal and profiles for the following items:

- Spent X-Ray Negatives (fenced hazmat area)
- Low Pressure Sodium Vapor Lamps (fenced hazmat area)

The drum at the Pipe Shop with the funnel has been removed. An open top drum with a lid will be used. Its current practice to latch all funnels, I have attached the training slide.

Rags and other waste streams such as gloves should not be mixed in the same hazmat. This is part of NASSCO's on-going training. I have provided a work instruction and training slide.

If you have any questions or require clarification, please don't hesitate to call me at 619 544 7780 or cell 619 997 2690.

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company 2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

Manifest · Fluorescent tubes, alkaline and cad batteries.pdf

NON-HAZARDOUS WASTE MANIFEST

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To Clint Seiter/R9/USEPA/US@EPA cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection Update | 2 of 5

2 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

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Manifest - Ballast, alkaline batteries and vapour lamps.pdf

NON-HAZARDOUS WASTE MANIFEST

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Hugo Bermudez <hbermude@nassco.com> 12/22/2005 02:47 PM To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection Update | 3 of 5

3 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

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Manifest - Trisodium phosphate, acetone, and zinc oxide.pdf

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Hugo Bermudez <hbermude@nassco:com> 12/22/2005 02:48 PM To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection Update | 4 of 5

4 of 5

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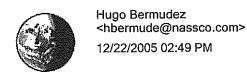
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Ashland Distribution Company WASTE PROFILE

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Technical Conta	act:	Dave Powers				a Ana, CA 92705	
Phone:		619-544-7736					
Fax:	ъ	619-544-7783		Billing Contact:	Blair	Collins	
Ashland Sales	s Kep:	Tony Snyder		Phone:		571-3269	
Phone:		714-571-4788		Fax:		571 -3 248	
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			PROPERTIES	S AND COMPOSITION			
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Waste Name:						····	
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Liquid Flash Po	oint <73°	F □ 73-99°F [] 100-139°F []	140-199°F ≥200°F [] A/A [☑ Closed Cup ☐	Open Cup 🗌
THE MICAL CO	OMPOSIT	TON: List ALL c	onstituents present	in any concentration and fo	orward a	available analysis.	
Constituer		TOPE, MICE, ILLE	Range/Uni	its Constituents			Range/Units
X-Ray Film		r Halide	100%				
Residue							
1(05)000							•
TOTAL COMPO	SITION M	UST EQUAL OR	EXCEED 100%			Analytical dat	a attached
			SHIPPIN	IG INFORMATION			
⊃ackaging:	Bulk Soli	d∏ Bull	k Liquid 🔲 🔝 Drum	∑ Type/Size:		Other	
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				40 hat Ordana Hola	MODE	S materials and T	
s a sample re	quired?	YES 🗌	NO 🖾		MSDS	attached	
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		ervising Samplin	a:				
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and the second	L	aman 10 t		tual UHC pr			
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s this a Benze	ene NESt	IAP Waste?:		min instant the party	,-		

GENER/	ATOR'S WASTEN	IATERIAL	PROFIL	E SHEET (CON	TINUED)		ASH 33-15604			
CONTAMINANTS: 🖂 TCLP 🔲 TOT			TOTAL		NONE IN	Profile # THIS SECTION PRESENT					
REGULATORY											
EPA#	<u>NAME</u>	<u>l</u>	EVEL	<u>ACTUAL</u>	=	EPA#	<u>NAME</u>	<u>L</u>	EVEL.	<u>ACTUAL</u>	
D004	Arsenic		>5.0			D024	m-Cresol		>200.0		
D005	Barium		>100.0			D025	p-Cresol		>200.0		
D006	Cadmium		>1.0			D026	Cresol (total)		>200.0		
⊃007	Chromium		>5.0			D027	1,4-Dichlorobenzene		>7.5	**************************************	
2008	Lead		>5.0			D028	1,2-Dichloroethane		>0.5		
2009	Mercury		>0.2	Pro-		D029	1,1-Dichloroethylene		>0.7		
D010	Selenium		>1.0			D030	2,4-Dinitrotoluene		>.13		
D011	Silver	\boxtimes	>5.0	***************************************		D031	Heptachlor		>0.008		
D012	Endrin		>0.02			D032	Hexachlorobenzene		>0.13		
D013	Lindane		>0.4	 		D033	Hexachloro-1,3-butadiene		>0.5		
D014	Methoxychlor		>10.0			D034	Hexachloroethane		>3.0		
D015	Toxaphene		>0.5			D035	Methyl ethyl ketone		>200.0		
D016	2,4-D		>10.0			D036	Nitrobenzene		>2.0		
D017	2,4,5-TP (Silvex)		>1.0	***************************************		D037	Pentachlorophenol		>100.0		
D018	Benzene		>0.5		***************************************	D038	Pyridine		>5.0		
D019	Carbon tetrachlor	ide 🔲	>0.5			D039	Tetrachloroethylene		>0.7		
D020	Chlordane		>0.03	1		D040	Trichloroethylene		>0.5		
D021	Chlorobenzene		>100.0)	 ,	D041	2,4,5 -Trichlorophenol		>400.0		
D022	Chloroform		>6.0	-		D042	2,4,6 -Trichlorophenol		>2.0	\ \\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\\	
D023	o-Cresol		>200.0)		D043	Vinyl chloride		>0.2		
TRANSPORTATION INFORMATION											
Is this a DOT Hazardous Material?											
Proper Shipping Name: RQ, Hazardous Waste Solid, n.o.s. (Silver)											
Hazard Class: 9											
Additional Description:											
CERCLA Reportable Quantity (RQ): 1 RQ Units (lb/kg): lbs ERG# 171											
SPECIAL HANDLING:											
Additional Page(s) Attached											
GENERATOR'S CERTIFICATION I hereby certify that all information submitted in this and all attached documents contains true and accurate descriptions of this waste. Any sample submitted is representative as defined in 40 CFR 261 - Appendix I or by using an equivalent method. All relevant information regarding known or suspected hazards in the possession of the generator has been disclosed. I authorize disposer to obtain a sample from any waste shipment for purposes of recertification. If the waste stream or process generating the waste changes, I will notify Ashland Distribution Co. prior to shipment of the waste.											
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Signatu	lre			rinte	ia (di	ivoed) nai	me and tille	Da	le:		



To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection Update | 5 of 5

5 of 5

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company

2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com

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HazMatCoord Training Funnel.pdf HazmatCoord Training Rags-Gloves.pdf Sub Training Rags-Gloves.pdf

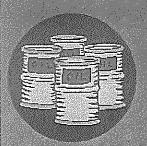
WI_403_Hazardous_Waste_Satellite_Accumulation.pdf

Hazardous Materials & Waste Containers

- Drums must be kept closed, except when adding or removing wastes.
- Drum Rings Must be kept Tight.
- Funnels Must be Latched.
- Clean up any minor spills (<1 quart) on or around drums immediately, IF IT IS SAFE TO DO SO. If it is not safe, CALL SECURITY

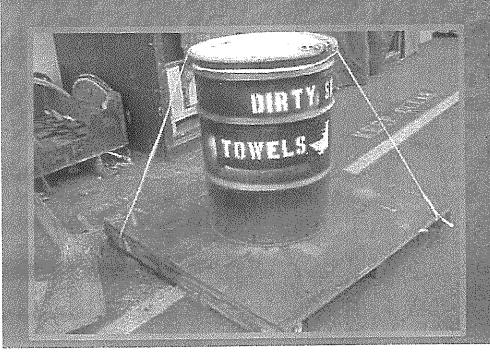
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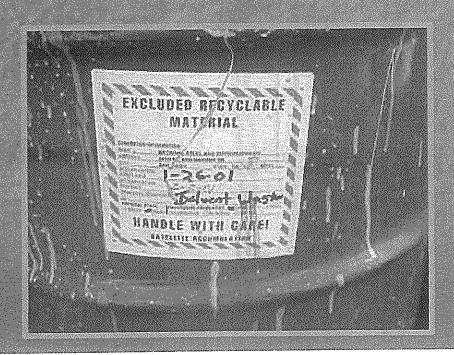




NASSCO Excluded Recyclable Maiterial Label Page 8

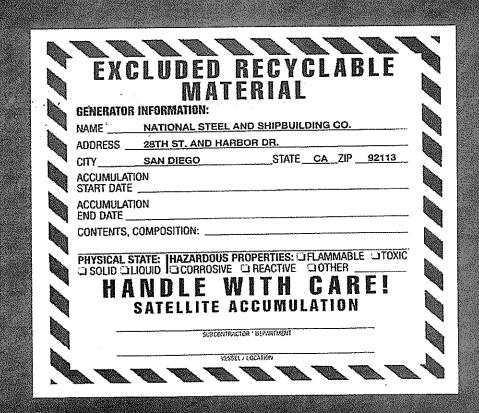
- White with Green Border Label/Sticker.
- Used Only on Materials Authorized by Environmental Engineering.
 - Shop Towels, Paint Solvent, Abrasive Blast Grit





Excluded Recyclable Material

- **Examples:**
 - Rags
 - Spent Steel Abrasive
 - Paint Solvent (GT 4637)
- Green Labels
- Can have more than one drum of same ERM waste in area.





Work Instruction No.: 403

Revision: C

Approved:	
	T. Michael Chee
	Manager, Environmental Engineering

(Signed copy on file in originating department listed in footer)

All printed copies are uncontrolled

and are obsolete as of midnight on the day printed. The user is responsible for verifying that any printed copy of this document is current before use.

Revision Record				
Revision	vision Date Description of Change			
A	05/25/01	Revised Section 1.0; Added References C through F; Added Definitions 4.2. & 4.3; Revised Section 5.1 & 5.2; Updated format & renumbered Section 6; Revised Sections 6.1, 6.1.4, 6.1.6, 6.1.7 and 6.1.9; Added Sections 6.1.11 through 6.2.3		
В	10/12/01	Added Definitions 4.1.1, 4.1.2; Added Section 6.1.7, renumbered subsequent sections; Revised Sections 6.1.4, 6.1.5 and 6.1.13		
С	04/24/03	Converted EEM Procedure No. 12 into Work Instruction No. 403.		



Work Instruction

No.: 403 Revision: C

1.0 Purpose:

To describe NASSCO's methods for managing hazardous waste in Satellite Accumulation Sites.

2.0 Scope:

The activities, products, or services conducted at the NASSCO facility, that NASSCO can have an influence over, and that have the potential to cause a significant environmental impact.

3.0 References:

- (a) Environmental Engineering Manual, Forms Section, Hazardous Materials/Waste Transportation Tracking Form.
- (b) Environmental Engineering Manual, Work Instruction No. 401, Hazardous Materials/Waste Transportation Tracking.
- (c) Environmental Procedure Manual, Procedure No. 03, Environmental Training, Awareness & Competence.
- (d) Environmental Engineering Manual, Forms Section, HazMat Coordinator Roster.
- (e) Environmental Engineering Manual, Forms Section, Hazardous Material/Waste Weekly Inspection Checklist.
- (f) Environmental Engineering Manual, Forms Section, Hazardous Waste Satellite Accumulation Site Guidelines.

4.0 <u>Definitions</u>:

- 4.1 Satellite Accumulation Site A designated area utilized for the accumulation of hazardous waste.
- 4.1.1 Green Zone(s) A Satellite Accumulation Site that is readily identifiable by a green crosshatched footprint.
- 4.1.2 Red Zone(s) Area designated for pick-up of hazardous waste that is readily identifiable by a red crosshatched footprint.
- 4.2 HazMat Coordinator An individual assigned to a specific Hazardous Waste Satellite Accumulation Site(s) by their management. This person must have received annual Hazardous Materials Coordinators Training in accordance with Reference (c).



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4.3 HazMat Designee – An individual ultimately responsible for managing a Hazardous Waste Satellite Accumulation Site(s) in their area of responsibility. HazMat Designees are listed per Reference (d).

5.0 <u>Responsibility</u>:

- 5.1 HazMat Designees are responsible for ensuring that this procedure is followed.
- 5.2 HazMat Coordinators are responsible for labeling, handling, and monitoring the hazardous waste in their Satellite Accumulation Site.

6.0 **Procedure:**

- HazMat Coordinators (Reference (d)) have been trained and are responsible for following NASSCO's instructions for Hazardous Waste Satellite Accumulation Sites as outlined below.
- 6.1.1 Determine the quantity and nature of the waste to be disposed of and proper waste handling procedures.
- 6.1.2 Contact HazMat, ext. 7736, to obtain waste accumulation drums.
- 6.1.3 Contact NASSCO Central Tool/Office Supplies for *Hazardous Waste Accumulation Labels* at ext. 3545.
- The Hazardous Materials/Waste Transportation Tracking Form, Reference (a), the Hazardous Material/Waste Weekly Inspection Checklist, Reference (e) and the Hazardous Waste Satellite Accumulation Site Guidelines, Reference (f) are located in the Forms Section of the Environmental Engineering Manual, and are available in LiveLink.
- Use 55-gallon or smaller drums for accumulating hazardous wastes (paint sludge, rags, wastewater, etc.). Remove any obsolete and/or inapplicable label(s).
- Utilize metal drums for storing paints, solvents, petroleum products, and other flammable wastes. Typically these drums are painted orange or black.
- 6.1.7 Flammable liquid waste drums must be grounded until they are completely full and sealed closed.
- 6.1.8 Utilize plastic polydrums for storing corrosive materials. Typically these drums are blue or black.

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- 6.1.9 The maximum quantity of a single type of hazardous waste in the Satellite Accumulation Site is 55 gallons.
- 6.1.10 Ensure that the hazardous waste container has a *Hazardous Waste Satellite Accumulation Label* attached on the side before placing waste into the container. As soon as waste first enters the container, enter the following onto the label:
- 6.1.10.1 Accumulation Start Date:
- 6.1.10.2 Contents, Composition: (Describe the waste, for example Waste Oil, Waste Paint, Oily rags, Paint Soaked Absorbents, etc)
- 6.1.10.3 Physical State: (Check or circle one: Solid, Liquid)
- 6.1.10.4 **Hazardous Properties:** (Check or circle one: Flammable, Toxic, Corrosive, Reactive, or enter the type of "Other")
- 6.1.10.5 Subcontractor/Department (Provide company name or NASSCO department name when requested on label)
- 6.1.10.6 Vessel/Location (Provide area where waste was generated when requested on the label)
- 6.1.11 Ensure that all hazardous waste is properly stored and protected from contact with the environment.
- 6.1.12 Do not mix different types of waste. If there is a need to dispose of a waste different than what is currently staged in the Satellite Accumulation Site, obtain a new drum.
- When the container becomes full or 9 months have elapsed, prepare the container for transport to the HazMat Department. Enter the Accumulation End Date on the waste label.
- 6.1.14 The container must be transferred to a Red Zone or the HazMat Department within three days of the Accumulation End Date.
- 6.1.15 HazMat Coordinators are responsible for completing the *Hazardous Materials/Waste*Transportation Tracking Form at the same time the Accumulation End Date is entered on the Hazardous Waste Satellite Accumulation Label.
- 6.1.16 Insert the completed *Hazardous Material/Waste Transportation Tracking Form* into a plastic shipping envelope on the drum and write the date and "HAZMAT" on the outside of the

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envelope. Contact NASSCO Transportation Department Dispatch at ext. 7581 for pick-up and transport to HazMat Department.

- 6.1.17 There is No Smoking or Open Flame within 50 feet of a Hazardous Waste Satellite Accumulation Site.
- 6.1.18 Hazardous Waste Satellite Accumulation Site Guidelines are considered "controlled documents" when located within the Environmental Engineering Manual. Copies made as handouts and for training purposes are considered "uncontrolled" and shall be verified for proper issue date with the Environmental Engineering Manual.
- 6.2 Satellite Accumulation Site Inspections
- 6.2.1 HazMat Coordinators inspect Satellite Accumulation Sites weekly utilizing the *Hazardous Material/Waste Weekly Inspection Checklist*.
- At the end of each month, the HazMat Coordinator files the completed inspection checklists in their area.
- 6.2.3 The Designated HazMat Coordinator or their supervisor retains the completed checklists for a minimum of one (1) year. These inspection checklists shall be readily available for review by an auditor upon request. Following the one-year retention period, these documents may be disposed of.

7.0 Attachments:

(1) Hazardous Waste Satellite Accumulation Label, sample format.

Date: 04/24/03

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Attachment 1:

<u>Hazardous Waste Satellite Accumulation Label – Sample Format</u>

	HAZARDOUS
	WASTE
	SATELLITE ACCUMULATION
	R INFORMATION: NATIONAL STEEL AND SHIPBUILDING CO.
NAME	28TH ST. AND HARBOR DR.
ACQUMULA' START DATI	
ACCÙMULA END DATÈ_	TION
CONTENTS,	, COMPOSITION:
PHYSICAL S • SOLID •	• LIQUID • CORROSIVE • REACTIVE • OTHER
	SUBCONTRACTOR / DEPARTMENT



Work Instruction No.: 103

Revision: D

1.0. Purpose:

To provide instructions for the management of coating products.

2.0. Scope:

All management of coating products in all stages of construction.

3.0. References:

- NASSCO Blast, Paint, and General Services, Procedure No. 2, Surface Preparation and Paint (a)
- NASSCO Safety Manual, Hazardous Communication, Section 800 (b)
- NASSCO Environmental Engineering, Procedure No. 3, Hazardous Materials/Waste Transportation (c) Tracking
- NASSCO Environmental Engineering, Procedure No. 12, Hazardous Waste Satellite Accumulation (d)
- San Diego Air Pollution Control District (APCD) Rules and Regulations (e)
- San Diego Air Pollution Control District (APCD) Permit to Operate 007657, Primeline (f)
- San Diego Air Pollution Control District (APCD) Permit to Operate 911437, Wood Products (g)

Definitions: 4.0

None

Responsibility: 5.0

The Superintendent of Blast, Paint, and General Services is responsible for ensuring that this work instruction is implemented and followed. Additional responsibility is assigned in Reference (a).

6.0 Procedure:

- 6.1 Receipt
- The process of receiving coatings from the coating supplier is detailed in Attachment (1), Receipt and Delivery 6.1.1 of Coating Products Flow Chart.
- The Paint Supervisor or Hazardous Material Coordinator at the satellite storage areas verifies, on receipt 6.1.2 and/or delivery, that coating batch numbers are current. To aid verification, Attachment (2), Paint Batch Numbers Reference Tables for Paint Production, shall be posted in all satellite storage areas.
- 6.2 Handling
- All coatings, approved according to Reference (b), are handled according to the coating manufacturer's 6.2.1 Material Safety Data Sheet (MSDS). Copies of MSDS's are maintained by the Industrial Hygiene department.

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- All coatings are stored according to the coating manufacturer's Product Data Sheet (PDS) and Material Safety 6.3.1 Data Sheet (MSDS). Copies of applicable PDS's are maintained by the Industrial Hygiene department.
- 6.3.2
- Request through the department Material Coordinator that the coating supplier extend the shelf life of the coating and mark the product container as "Shelf Life Extended." The Material Coordinator shall maintain the paperwork.

Mark the product as "For Maintenance Use Only." (2)

- (3)
- 6.4 Issue and Usage
- Paint production will use the Paint Issue form (Attachment (3)) to order coating materials and the Paint Usage 6.4.1 form (Attachment (4)) to record weekly use.
- The department Material Coordinator will maintain the data from the issue and usage forms in their paper 6.4.2 form and/or in a like database.
- The department Material Coordinator will support the usage record keeping and reporting requirements 6.4.3 defined in Reference (e), for the following coating operations:
 - Architectural Coatings (Rule 67.0) (1)
 - Metal Parts and Products Coating Operations (Rule 67.3) (2)
 - Wood Products Coating Operations (Rule 67.11) (3)
 - Marine Coating Operations (Rule 67.18) (4)
 - Motor Vehicles and Mobile Equipment Refinishing Operations (Rule 67.20) (5)
- In addition to the requirements defined in paragraph 6.4.3 above, the Material Coordinator or the SOC 1 Paint 6.4.4 Supervisor shall ensure that the maximum usage requirements for the Primeline and Wood Products Operations, detailed in References (f) and (g), are not exceeded.
- Paint Waste Management 6.5
- Paint waste will be managed as detailed in References (c) and (d). 6.5.1



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Revision: D

Approved:	/s/
••	Judie Blakey
	Superintendent, Blast, Paint, and General Services

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Revision Record					
Revision	Date	Date Description of Change			
,,,,,	12/18/98				
Α	2/01/99	Process flowchart, along with referencing text, updated. Also, minor editorial change.			
В	6/01/99	Attachment (4) revised. Also, minor editorial changes.			
С	12/01/01	Reference to coating material approval added in para 6.1.1; handling of expired products added as para 6.4; Paint Usage form updated and set in landscape.			
D	12/21/01	Re-Issue			

WORK INSTRUCTION 103 REV D.doc

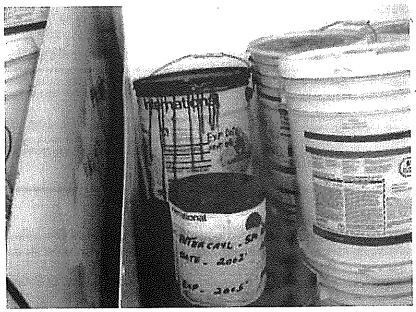
Blast, Paint, and General		Date: 12/21/01
Services Department		Page 1 of 8
Department 016/022	PRINTED ON 11/29/05 3:54 PM	

Before pictures: Paint Storage log lists all paints and expiration dates, expired paints are removed from the log and sent to

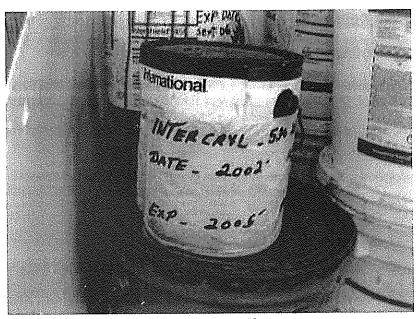
hazmat for proper disposal. This form was last updated on November 29, 2005.

nazmat for proper disposal. This form was	iast upos	Paint S		
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Interspeed 640-BRA640 (Red)	65	Jan-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA640 (Red)	115	Jul-2007	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	84	Nov-2006	Y-T-AKE	Underwater Hull
Interspeed 640-BRA642 (Blk)	55	Dec-2006	Y-T-AKE	Underwater Hull
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Intertuf 262-KHA302 (Gray)		Apr-2007	N	
Intergard 403-KBA401(Off White)		Mar-2006	N	Need 2 gls of reactor
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Intergard 621-DK Gray		Jan-2007	N	Non-skid EK5040H
Interline 624-THA664 (Red)	75	Jun-2007	Y-T-AKE	and the second second second second second second second second second second second second second second second
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PSX700-Safety Blue	4	Sept-2006	Y-T-AKE	
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PSX700-Safety Yellow	34	Oct-2007	Y-T-AKE	
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Cosmoline	11			

Before pictures: The paint had an expiration date of August 2005 (still within the 90 days), paint will be disposed before the 90 days. Manifest for the spent paint is attached to this report and the paint is indicated by "Paint Solids" on the manifest.



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PICT0087_IPG 2048x1536x24bjpeg



Environmental Corrective Action Request (ECAR)

EC-2005-044 ISSUED DATE: 11/17/2005

Issued To: Blast & Paint (16) Reported By: John Martin

Judie Blakey Superintendent, Production Phone: (619) 544-8443

Mailstop: 02

Environmental Engineering Phone: (619) 544-3553 Fax: (619) 744-1088

Email: jmartin@nassco.com

Your department has been found in non-conformance with NASSCO's Environmental Policies. As a result, an Environmental Corrective Action Request has been filed and you are expected to submit a Preventive Action Taken in response to this ECAR.

Please complete the Cause and Corrective Action Section of the attached ECAR and return it to NASSCO Environmental Engineering within 10 days of the date of issue. You may choose to submit a copy of your response via fax at (619) 744-1088 c as an email message directed to the Issueing Engineer referencing EC-2005-044, to ensure that you meet the required deadline. Please reference EC-2005-044 on any attachments that are submitted.

Summary

On November 16, 2005, US EPA personnel performed a RCRA inspection of Small Parts Paining area - Paint Storage. The following item of non-compliance were noted that need corrective action:

- 1. A number of one gallon paint containers has no expiration dates on the paint containers.
- 2. One 5 gallon paint can had a expiration date August 2005 with no decision made as to the disposal or recycling of the paint container

Regulatory and/or EMS Reference:

Corrective Action Response:

The department was unaware of the regulation 40 CFR 262.11 about expired paint. There is no statement in the ISO 14001 reference guide.

Hugo Bermudez, Environmental Engineer provide the department with the 40 CFR 626.11 regulation to reference the expired paint. The discrepant paint was sent to hazardous waste for disposal.

Our department policy has been to send any expired paint back to the main paint storage site for disposition.

All department supervision will be informed at the weekly staff meeting (next meeting 11/28/05) and there will be a handout for them to present the information to their crews in their 5-minute morning meeting.

/s/ Juan Saludes on 11/22/2005



Work Instruction No.: 103

Revision: D

7.0 <u>Attachments</u>:

- (1) Process Flowchart for the Request and Delivery of Paint
- (2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)
- (3) Paint Issue Form
- (4) Paint Usage All Areas Form (SAMPLE)



Work Instruction No.: 103

Revision: D

(1) Process Flowchart for the Request and Delivery of Paint

PRODUCTION

MATERIAL COORDINATOR

SUPPLIER

Review Long Range Schedules (1) Determine Pallets to Release (2)

> Extract Pallets From Internal Sprèadsheet (3)

Approve Release Against Purchase Order (4)

Fax or Email Approved Releases to Coating Supplier (5) Kit Material Per Request (6)

Review
Approve/Disapprove
Receivers and Deliver
to Material
Coordinator
(8)

Update Internal Spreadsheet (9)

Deliver Material (7)

Post Receivers (10)

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Revision: D

(2) Paint Batch Reference Numbers Reference Tables for Paint Production (SAMPLE)

TABLE 1. IDENTIFYING YEAR AND MONTH INFORMATION FROM BATCH NUMBERS

COATING	EXAMPLE BATCH #	YEAR CODE	YEAR	MONTH/DAY CODE	MONTH
AMERON	LR 2002 0 1 3 2 7 0	2002	2002	01	JANUARY
DEVOE	LR 2002 0 5 0 2 0 8	2002	2002	05	MAY
INTERNATIONAL	2 M 6 6 4 6 U U A 6	2	2002	М	DECEMBER
INTERNATIONAL	CB1234UHA1	С	2002	В*	FEBRUARY
PROLINE	7670C2	2	2002	С	MARCH
SHERWIN WILLIAMS	P M 0 5 0 2 A	2	2002	050**	FEBRUARY 20
SIGMA	02 0 8 - 0 0 1 1	02	2002	80	AUGUST

^{*}INTERNATIONAL REVISED ITS BATCH NUMBERING SYSTEM BEGINNING IN JANUARY 2000. FOR BATCHES PRIOR TO THAT DATE THE OLD SYSTEM IS STILL IN AFFECT.

TABLE 2. IDENTIFYING MONTH OF MANUFACTURE, MAIN COATING SUPPLIERS

INTERNATIONAL**	PROLINE	AMERON, DEVOE, AND SIGMA
A = JANUARY	A = JANUARY	01 = JANUARY
B = FEBRUARY	B = FEBRUARY	02 = FEBRUARY
C = MARCH	C = MARCH	03 = MARCH
D = APRIL	D = APRIL	04 = APRIL
E = MAY	E = MAY	05 = MAY
F = JUNE	F = JUNE	06 = JUNE
G = JULY	G = JULY	07 = JULY
H = AUGUST	H = AUGUST	08 = AUGUST
J = SEPTEMBER	I = SEPTEMBER	09 = SEPTEMBER
K = OCTOBER	J = OCTOBER	10 = OCTOBER
L = NOVEMBER	K = NOVEMBER	11 = NOVEMBER
M = DECEMBER	L = DECEMBER	12 = DECEMBER

^{**}INTERNATIONAL DOES NOTUSE THE LETTER'I'

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^{**}SHERWIN WILLIAMS IDENTIFIES THE BATCH BY YEAR AND BY DAY OF THE YEAR. IN THE EXAMPLE ABOVE, ?050" IS THE FIFTIETH DAY OF 2002.



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(3)	Paint Issu	ie Form
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PAINT ISSUE

TO FROM DATE

DELIVERY LOCATION

CHARGE NUMBER

DELIVERY LOCATION													
PAINT/	AMOUNT	UNIT, ZONE,	SQUARE	GALS	BATCH NUMBER								
SOLVENT	(GALS	COMPARTMENT, TANK NUMBER	FEET	SENT	PAINT	GALS	CONVERTOR REACTOR	GALS					
					<u> </u>								

SUPERVISOR'S SIGNATURE	
SHIPPER'S SIGNATURE	

- 1. FILL OUT THIS FORM COMPLETELY. USE SEPARATE SHEET FOR EACH CHARGE NUMBER.
- 2. SUBMIT COMPLETED FORM TO MATERIAL COORDINATOR/SR PLANNER SCHEDULER.
- 3. PAINT WILL BE DELIVERED ACCORDING TO JUST IN TIME SCHEUDLE.

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FROM	

4. SECOND SHIFT MUST FILL OUT THIS FORM AND LEAVE IT IN THE MAILBOX OF THE MATERIAL COORDINATOR.

5. BATCH NUMBERS ARE PROVIDED BY THE PAINT SHIPPER.

(4) Paint Usage All Areas Form (SAMPLE)

DATE:	RULE	(CIRCLE)	MARINE	ARCH	METAL	WOOD
LOCATION:						
SUPERVISOR/SUBCONTRACTOR:						

REF	VENDOR NAME	PRODUCT NAME	VOC	GALLONS	USED E	METHOD USED (REPORT IN GALLONS)									
МО				MON	TUE	WED	THU	FRI	SAT	SUN	TOTAL	AIRLES S	CONV	HVLP	R/B
1	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-10C												į	
2	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-2000 (MS 200)								ļ					
3	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	·													İ
4	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-400G					-	SA	MF	PLE					
5	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-50								T	1		1		
6	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-5C													
7	AMERICAN SAFETY TECHNOLOGIES, INC. (ITW)	MS-7C						<u> </u>							<u> </u>
8	AMERON PROTECTIVE COATINGS	923 (SOLVENT)									-			<u> </u>	
9	AMERON PROTECTIVE COATINGS	AMERCOAT 101 (SOLVENT)												-	
10	AMERON PROTECTIVE COATINGS	AMERCOAT 15 (SOLVENT)													
11	AMERON PROTECTIVE COATINGS	AMERCOAT 182									ļ			ļ	
12	AMERON PROTECTIVE COATINGS	AMERCOAT 275E						<u></u>		<u> </u>	<u> </u>				

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	13	AMERON PROTECTIVE COATINGS	AMERCOAT 277E			 	 			
ľ	14	AMERON PROTECTIVE COATINGS	AMERCOAT 3203			 		 		
ı	15	AMERON PROTECTIVE COATINGS	AMERCOAT 3234				 			

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Hugo Bermudez <hbermude@nassco.com> 01/12/2006 01:31 PM To Clint Seiter/R9/USEPA/US@EPA

cc John.Kolb@sdcounty.ca.gov

bcc

Subject NASSCO Inspection - Action Items Update (1 of 3)

Mr. Seiter:

Here are the updates for the two action items we discussed during our telecom on January 5, 2006.

a) NASSCO Contingency/Business Plan layouts do not show or identify fire extinguishers and spill kits.

- All contingency plans have been updated to reflect the fire extinguisher locations

- Spill kits are not listed in the plans because not all yard personnel are trained to respond and clean up spills. NASSCO has an onsite response team (Fire Department) for responding to spill incidents.

b) Oil storage tanks at the Waste Water Treatment Facility (6,000 Gal) and the Vehicle Maintenance area (250 Gal) are identified as "Waste Oil". Oil stored or held for recycling shall be identified as used oil.

- Both oil tanks have been labeled with the words "Used Oil".

I have included with this note the updated contingency/business plan layouts and pictures of the two subject tanks for your review. If you need additional information or clarification, please don't hesitate to call me.

Also, have you completed the flip-top drum lids section of the report? If so, I would like to get information and further discuss with you.

Thanks,

HUGO BERMUDEZ, Environmental Engineering Specialist

NASSCO, a General Dynamics Company

2798 Harbor Drive, San Diego California 92113 | T 619 544 7780 | F 619 744 1088 | hbermude@nassco.com



Oil Tanks before and after.pdf Site 02 hazwaste storage Layout1 (1).pdf Site 01 yard layout Layout1 (1).pdf



Site 03 waste water treatment facility Layout1 (1) pdf